

EMISSION UNIT TERMS AND CONDITIONS

U. S. Steel Clairton Works
Title V Operating Permit No. 0052

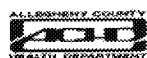
- 1) Records described in §63.10(b)(2)(vi) through (xi).
 - 2) Monitoring data for COMS during a performance evaluation as required in §63.6(h)(7)(i) and (ii).
 - 3) Previous (that is, superseded) versions of the performance evaluation plan as required in §63.8(d)(3).
 - 4) Records of the date and time that each deviation started and stopped, and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period.
- d. The permittee shall keep the records in §63.6(h)(6) for visual observations. [§2103.12.j; §2103.12.h.6; §63.7342(c)]
- e. The permittee shall keep the records required in Conditions V.G.3.p above and V.G.4.k below to show continuous compliance with each emission limitation, work practice standard, and operation and maintenance requirement that applies to you. [§2103.12.j; §2103.12.h.6; §63.7342(d)]
- f. The permittee shall keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§2103.12.j; §2103.12.h.6; §63.7343(a)]
- g. As specified in §63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§2103.12.j; §2103.12.h.6; §63.7343(b)]
- h. The permittee shall keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years. [§2103.12.j; §2103.12.h.6; §63.7343(c)]
- i. For each by-product coke oven battery, the permittee must demonstrate continuous compliance with the operation and maintenance requirements in V.G.3.i above by adhering at all times to the plan requirements and recording all information needed to document conformance. [§2103.12.j; §63.7335(a)]
- j. The permittee shall maintain a current copy of the operation and maintenance plans required in V.G.3.i onsite and available for inspection upon request. The plans shall be kept for the life of the affected source or until the affected source is no longer subject to the requirements of 40 CFR Part 63, Subpart CCCCC. [§2103.12.j; §63.7335(d)]
- k. The permittee must demonstrate continuous compliance to the work practice standard for soaking in V.G.6.k below, by maintaining records that document conformance with requirements in V.G.6.k.1) through V.G.6.k.5) below. [§2103.12.j; §2103.12.h.6; §63.7334(d)]

5. Reporting Requirements:

- a. No later than twenty (20) days after the end of each month, a written report of a summary of the following during each such month shall be submitted to the Department: [§2103.12.k; §2109.03 and Enforcement Order 202.E, 3/28/90]
- 1) For all coke batteries combined, the daily average for the month of:
 - a) Coal charged, in tons;
 - b) Coke produced, in tons;
 - c) Total coke oven gas produced; in MMCF;

- d) Quench water used, in gallons;
 - e) Elemental sulfur produced, in tons;
 - f) Sulfur content of coal, in percent; and
 - g) Sulfur content of coke, in percent.
- 2) For all periods during which contaminated quench water was used:
- a) The batteries affected;
 - b) The starting and ending dates and times;
 - c) The total time of each period, and total for the month, to the nearest tenth of an hour;
 - d) The corresponding Department Breakdown Number;
 - e) The average flow rates of contaminated water to both the quench towers and the water treatment plant during the period, each in gallons per minute; and
 - f) The reason(s) or cause(s) for each period.
- b. No later than twenty (20) days after the end of each month, a written report of a summary of the following for Coke Battery B combustion stack continuous opacity monitoring system, during each such month shall be submitted to the Department: [§2103.12.k; Enforcement Order No. 161, July 23, 1990]
- 1) The monthly percentage availability (on-line time), based on total minutes of coke operations and total minutes available;
 - 2) The daily percentage available;
 - 3) The number of days on which there was less than 100% availability;
 - 4) For each of the coke oven combustion stack visible emission standards set forth in §2105.21.f.3 & f.4, the total number of hours for the month, and the number of hours each day, during which an exceedance of such standard was measured by such continuous opacity monitor;
 - 5) The number and nature of tests, calibrations, and any other quality assurance activities performed; and
 - 6) The dates, times and results of all such activities.
- c. The permittee shall include the following information in the semiannual compliance certification: [§2103.12.k; §2103.12.h.6; §63.311(d)]
- 1) Certification, signed by the permittee, that no coke oven gas was vented, except through the bypass/bleeder stack flare system during the reporting period or that a venting report has been submitted according to the requirements in Condition V.G.5.d below.
 - 2) Certification, signed by the permittee, that a startup, shutdown, or malfunction event did not occur for a coke oven battery during the reporting period or that a startup, shutdown, and malfunction event did occur and a report was submitted according to the requirements in Condition V.G.5.d below; and
 - 3) Certification, signed by the permittee, that work practices were implemented if applicable under Condition IV.27 above.
- d. The permittee shall report any venting of coke oven gas through a bypass/bleeder stack that was not vented through the bypass/bleeder stack flare system to the Department as soon as practicable but no later than 24 hours after the beginning of the event. A written report shall be submitted within 30 days of the event and shall include a description of the event and, if applicable, a copy of the notification for a hazardous substance release required pursuant to 40 CFR §302.6. [§2103.12.k; §2103.12.h.6; §63.311(e)]

- e. In order for the provisions of §63.310(i) to apply with respect to the observation (or set of observations) for a particular day, notification of a startup, shutdown, or a malfunction shall be made by the permittee as follows: [§2103.12.k; §2103.12.h.6; §63.310(d)]
 - 1) If practicable, to the certified observer if the observer is at the facility during the occurrence; or
 - 2) To the Department, in writing, within 24 hours of the occurrence first being documented by a company employee, and if the notification was not made, an explanation of why no such notification was made.
- f. Within 14 days of the notification made in accordance with condition §63.310(d), or after a startup or shutdown, the permittee shall submit a written report to the Department that: [§2103.12.k; §2103.12.h.6; §63.310(e)]
 - 1) Describes the time and circumstances of the startup, shutdown, or malfunction; and
 - 2) Describes actions taken that might be considered inconsistent with the startup, shutdown, or malfunction plan.
- g. The permittee shall submit to the Department a Semi-Annual Deviation Report for all deviations from Article XXI §2105.21(e)(4) and (e)(5) for Battery B. [§2103.12.k; Consent Order and Agreement (COA), Third Amendment, July 6, 2011, Condition V.b]
- h. The permittee shall report each instance in which each emission limitation in Conditions V.G.1.t and V.G.1.u was not met. This includes periods of startup, shutdown, and malfunction. The permittee shall also report each instance in which the permittee did not meet each work practice standard or operation and maintenance requirement in Conditions V.G.6.k, V.G.6.l and V.G.6.m. These instances are deviations from the emission limitations (including operating limits), work practice standards, and operation and maintenance requirements of 40 CFR Part 63, Subpart CCCCC. These deviations must be reported according to the requirements in V.G.5.l through V.G.5.p below. [§2103.12.k; §2103.12.h.6; §63.7336(a)]
- i. During periods of startup, shutdown, and malfunction, you must operate in accordance with your startup, shutdown, and malfunction plan. [§2103.12.k; §2103.12.h.6; §63.7336(b)]
 - 1) Consistent with §63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if you demonstrate to the Department's satisfaction that you were operating in accordance with the startup, shutdown, and malfunction plan.
 - 2) The Department will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in §63.6(e).
- j. The permittee shall submit all of the notifications in §63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e) and (f)(4), and 63.9(b) through (h) that apply to you by the specified dates. [§2103.12.k; §2103.12.h.6; §63.7340(a)]
- k. If you are required to conduct a performance test, the permittee shall submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in §63.7(b)(1). [§2103.12.k; §2103.12.h.6; §63.7340(d)]
- l. Unless the Department has approved a different schedule, the permittee must submit quarterly



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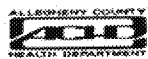
compliance reports for battery stacks to the Department according to the requirements in Conditions V.G.5.l.1) and V.G.5.l.2) below: [§2103.12.k; §2103.12.h.6; §63.7341(a)]

- 1) Each quarterly compliance report for battery stacks shall be submitted in accordance with General Condition III.15.e above.
 - 2) All quarterly compliance reports for battery stacks must be postmarked or delivered no later than one calendar month following the end of the quarterly reporting period. .
- m. Each quarterly report must provide information on compliance with the emission limitations for battery stacks in V.G.1.t above. The reports must include the information in Conditions V.G.5.n.1) through V.G.5.n.3) below, and as applicable, Conditions V.G.5.n.4) through V.G.5.n.8) below. [§2103.12.k; §2103.12.h.6; §63.7341(b)]
- n. Each semiannual compliance report must provide information on compliance with the emission limitations, work practice standards, and operation and maintenance requirements for all affected sources except battery stacks. The reports must include the information in V.G.5.n.1) through V.G.5.n.3) below, and as applicable, Conditions V.G.5.n.4) through V.G.5.n.8) below. [§2103.12.k; §2103.12.h.6; §63.7341(c)]
- 1) Company name and address.
 - 2) Statement by a responsible official, with the official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - 3) Date of report and beginning and ending dates of the reporting period.
 - 4) If there was a startup, shutdown, or malfunction during the reporting period and the permittee took actions consistent with the startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
 - 5) If there were no deviations from the continuous compliance requirements in V.G.3.p above for battery stacks, a statement that there were no deviations from the emission limitations during the reporting period.
 - 6) If there were no periods during which a continuous monitoring system (including COMS, continuous emission monitoring system (CEMS), or CPMS) was out-of-control as specified in §63.8(c)(7), a statement that there were no periods during which a continuous monitoring system was out-of-control during the reporting period.
 - 7) For each deviation from an emission limitation in 40 CFR 63, Subpart CCCCC and for each deviation from the requirements for work practice standards in this 40 CFR Part 63, Subpart CCCCC that occurs at an affected source where the permittee is not using a continuous monitoring system (including a COMS, CEMS, or CPMS) to comply with the emission limitations in this subpart, the compliance report must contain the information in Conditions V.G.5.n.4), V.G.5.n.7)a) and V.G.5.n.7)b) below. This includes periods of startup, shutdown, and malfunction.
 - a) The total operating time of each affected source during the reporting period.
 - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable and the corrective action taken.
 - 8) For each deviation from an emission limitation occurring at an affected source where the permittee is using a continuous monitoring system (including COMS, CEMS, or CPMS) to comply with the emission limitation 40 CFR 63, Subpart CCCCC, the permittee must include the information in Conditions V.G.5.n.4), V.G.5.n.8)a) through V.G.5.n.8)i) below. This includes periods of startup, shutdown, and malfunction.
 - a) The date and time that each malfunction started and stopped.
 - b) The date and time that each continuous monitoring system (including COMS, CEMS, or

- CPMS) was inoperative, except for zero (low-level) and high-level checks.
 - c) The date, time, and duration that each continuous monitoring system (including COMS, CEMS, or CPMS) was out-of-control, including the information in §63.8(c)(8).
 - d) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.
 - e) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
 - f) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
 - g) A summary of the total duration of continuous monitoring system downtime during the reporting period and the total duration of continuous monitoring system downtime as a percent of the total source operating time during the reporting period.
 - h) An identification of each HAP that was monitored at the affected source.
 - i) A brief description of the process units.
 - j) A brief description of the continuous monitoring system.
 - k) The date of the latest continuous monitoring system certification or audit.
 - l) A description of any changes in continuous monitoring systems, processes, or controls since the last reporting period.
- o. If the permittee had a startup, shutdown, or malfunction during the semiannual reporting period that was not consistent with your startup, shutdown, and malfunction plan, you must submit an immediate startup, shutdown, and malfunction report according to the requirements in §63.10(d)(5)(ii). [§2103.12.k; §2103.12.h.6; §63.7341(d)]
- p. If the permittee submits a compliance report for an affected source along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the compliance report includes all the required information concerning deviations from any emission limitation or work practice standard in 40 CFR Part 63, Subpart CCCCC, submission of the compliance report satisfies any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report does not otherwise affect any obligation you may have to report deviations from permit requirements to the Department [§2103.12.k; §2103.12.h.6; §63.7341(e)]

6. Work Practice Standards:

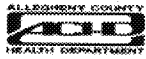
- a. Coke Oven Battery B shall be properly maintained and operated at all times according to good engineering and air pollution control practices. [§2105.06; RACT Plan 234]
- b. The permittee shall comply with the provisions of the applicable workpractice requirements in Site level Condition IV.27.a above. [§2103.12.h.6; §63.306]
- c. The permittee shall develop and implement according to Condition V.G.6.d below, a written startup, shutdown, and malfunction plan that describes procedures for operating the battery, including associated air pollution control equipment, during a period of a startup, shutdown, or malfunction in a manner consistent with good air pollution control practices for minimizing emissions, and procedures for correcting malfunctioning process and air pollution control equipment as quickly as practicable. All the provisions of Site Level Condition IV.8 above remain applicable and are not superceded by operating in accordance with the startup, shutdown, and malfunction plan. [§2103.12.h.6; §63.310(b)]



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- d. During a period of startup, shutdown, or malfunction the permittee shall: [§2103.12.h.6; §63.310(c)]
- 1) Operate the battery (including associated air pollution control equipment) in accordance with the procedure specified in the startup, shutdown, and malfunction plan; and
 - 2) Correct malfunctions as soon as practicable after their occurrence, in accordance with the plan.
- e. In order for the provisions of Condition V.G.6.j below to apply with respect to the observation (or set of observations) for a particular day, notification of a startup, shutdown, or a malfunction shall be made by the permittee: [§2103.12.h.6; §63.310(d)]
- 1) If practicable, to the certified observer if the observer is at the facility during the occurrence; or
 - 2) To the Department, in writing, within 24 hours of the occurrence first being documented by a company employee, and if the notification under Condition V.G.6.e.1) above was not made, an explanation of why no such notification was made.
- f. Within 14 days of the notification made under Condition V.G.6.e above, or after a startup or shutdown, the permittee shall submit a written report to the Department that: [§2103.12.h.6; §63.310(e)]
- 1) Describes the time and circumstances of the startup, shutdown, or malfunction; and
 - 2) Describes actions taken that might be considered inconsistent with the startup, shutdown, or malfunction plan.
- g. The permittee shall maintain a record of internal reports which form the basis of each malfunction notification under Condition V.G.6.e above. [§2103.12.h.6; §63.310(f)]
- h. To satisfy the requirements of §63.310 to develop a startup, shutdown, and malfunction plan, the permittee may use the standard operating procedures manual for the battery, provided the manual meets all the requirements in §63.310 and is made available for inspection at reasonable times when requested by the Department. [§2103.12.h.6; §63.310(g)]
- i. The Department may require reasonable revisions to a startup, shutdown, and malfunction plan, if the Department finds that the plan: [§2103.12.h.6; §63.310(h)]
- 1) Does not address a startup, shutdown, or malfunction event that has occurred;
 - 2) Fails to provide for the operation of the source (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions; or
 - 3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.
- j. If the permittee demonstrates to the satisfaction of the Department that a startup, shutdown, or malfunction has occurred, then an observation occurring during such startup, shutdown, or malfunction shall not: [§2103.12.h.6; §63.310(i)]
- 1) Constitute a violation of relevant requirements of 40 CFR 63, Subpart L;



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- 2) Be used in any compliance determination under §63.309; or
 - 3) Be considered for purposes of Condition IV.27 above, until the Department has resolved the claim that a startup, shutdown, or malfunction has occurred. If the Department determines that a startup, shutdown, or malfunction has not occurred, such observations may be used for purposes of Condition IV.27 above, regardless of whether the permittee further contests such determination. The permittee's receipt of written notification from the Department that a startup, shutdown, or malfunction has not occurred will serve, where applicable under Condition IV.27 above, as written notification from the certified observer that an exceedance has occurred.
- k. The permittee shall prepare and operate at all times according to a written work practice plan for soaking. Each plan must include measures and procedures to: [§2103.12.h.6; §63.7294(a)]
- 1) Train topside workers to identify soaking emissions that require corrective actions.
 - 2) Damper the oven off the collecting main prior to opening the standpipe cap.
 - 3) Determine the cause of soaking emissions that do not ignite automatically, including emissions that result from raw coke oven gas leaking from the collecting main through the damper, and emissions that result from incomplete coking.
 - 4) If soaking emissions are caused by leaks from the collecting main, take corrective actions to eliminate the soaking emissions. Corrective actions may include, but are not limited to, reseating the damper, cleaning the flushing liquor piping, using aspiration, putting the oven back on the collecting main, or igniting the emissions.
 - 5) If soaking emissions are not caused by leaks from the collecting main, notify a designated responsible party. The responsible party must determine whether the soaking emissions are due to incomplete coking. If incomplete coking is the cause of the soaking emissions, you must put the oven back on the collecting main until it is completely coked or you must ignite the emissions.
- l. As provided in §63.6(g), the permittee may request to use an alternative to the work practice standard for soaking in Condition V.G.6.k above. [§2103.12.h.6; §63.7294(b)]
- m. The permittee shall be in compliance with the emission limitations, work practice standards, and operation and maintenance requirements of 40 CFR 63, Subpart CCCCC at all times, except during periods of startup, shutdown, and malfunction as defined in §63.2. [§2103.12.h.6; §63.7310(a)]
7. **Additional Requirements:**
- a. The definitions in 40 CFR 63.7352 are hereby incorporated into this permit by reference.

PERMIT SHIELD IN EFFECT

H. Battery No. B Pushing Emission Control (PEC) Baghouse: P054

Process Description: Coke-side shed with stationary baghouse
Facility ID: P054
Max. Design Rate: 480,000 acfm @ 125°F
Capacity: 480,000 acfm @ 125°F
Raw Materials: NA
Control Device: Pulse-jet baghouse

As identified above, Process P054 consists of the following number and type of equipment:

Baghouse Stack Emissions (Battery B)
 Fugitive Pushing Emissions
 Baghouse Dust Handling (Battery B)

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, Battery B coke ovens unless there is installed on the battery a pushing emission control system baghouse which is designed to reduce fugitive emissions from pushing to the minimum attainable through the use of BACT, nor shall the permittee operate, or allow to be operated Battery B coke ovens in such manner that: [§2105.21.e]
 - 1) At any time, the particulate mass emission rate from the pushing emission control system device, for Battery B exceeds a rate determined by an outlet concentration of 0.040 pounds per ton of coke. [§2105.21.e.3.E; Consent Order Agreement, Condition # 13]
 - 2) Fugitive pushing emissions or emissions from the pushing emission control system device outlet equal or exceed an opacity of 20% at any time, except if the Department determines in writing, upon written application from the person responsible for the coke ovens setting forth all information needed to make such determination, that such emissions are of only minor significance with respect to causing air pollution and do not prevent or interfere with the attainment or maintenance of any ambient air quality standard (any such determination shall be submitted as a proposed revision to Allegheny County's portion of the SIP). [§2105.21.e.4]
- b. The permittee shall not operate, or allow to be operated Battery B, unless the PEC System baghouse is properly installed, operated and maintained according to the following conditions, at all times: [§2105.03]
 - 1) Emissions due to the pushing of Battery B coke ovens shall be vented through the PEC System baghouse dust collector.
 - 2) The baghouse shall be equipped with automatic cleaning controls and instrumentation that shall continuously measure the differential pressure drop across the baghouse to within 5.0% of the measuring span of the device.
 - 3) Cleaning, maintenance, etc. shall be conducted as necessary when the pressure drop goes beyond the specified range.
- c. The permittee shall not discharge to the atmosphere emissions of particulate matter from a control device applied to pushing emissions from a coke oven battery that exceed 0.01 grain per dry standard cubic foot (gr/dscf). [§2103.12.h.6; §63.7290(a)]

- d. For each PEC System the permittee shall: [§2103.12.h.6; §63.7290(b)(3)]
- 1) Maintain the daily average fan motor amperes at 15 or above the minimum level established during the most recent performance test; or
 - 2) Maintain the daily average volumetric flow rate at the inlet of the control device at or above the minimum level established during the initial performance test.
- e. For each control device applied to pushing emissions and subject to the emission limit in V.H.1.c above, the permittee shall demonstrate continuous compliance by meeting the requirements in Conditions V.H.1.e.(1) and V.H.1.e.2) below: [§2103.12.h.6; §63.7333 (a)]
- 1) Maintaining emissions of particulate matter at or below 0.01 grain per dry standard cubic foot (gr/dscf); and
 - 2) Conducting subsequent performance tests to demonstrate continuous compliance no less frequently than once every two years.
- f. Emissions from Battery B PEC System baghouse shall not exceed the limits listed in Table V-H-1 at any time: [§2105.21.e.3; §2105.03]

TABLE V-H-1 - Emission Limitations for Battery B PEC System Baghouse

POLLUTANT	LB/TON- COKE	HOURLY EMISSION LIMIT (lb/hr)	ANNUAL EMISSION LIMIT (tons/year)*
Particulate Matter	0.040	5.28	23.14
PM-10	0.040	5.28	23.14

* A year is defined as any consecutive 12-month period.

2. Testing Requirements:

- a. The permittee shall have baghouse particulate emission stack tests conducted to demonstrate compliance with Condition V.H.1.a.1) above. The test shall be conducted once every two years using EPA Methods No.1 through No.5 and performed according to Site Level Condition IV.13. [§2108.02; Consent Order, 6/01/2007, #13; §63.7321]
- b. Visible emissions observations of the baghouse stack exhaust and fugitive pushing emissions shall be conducted at least once every two years, as specified in Section 109 of the Department's source testing manual, and be done simultaneously with the baghouse stack tests. [§2108.02]
- c. The permittee shall conduct each performance test according to the requirements in Condition V.H.2.d. [§2103.12.h.6; §63.7322(a)]
- d. To determine compliance with the process weighted mass rate of particulate matter (lb/ton of coke) in Condition V.H.1.c above use the following test methods and procedures: [§2103.12.h.6; §63.7322(b)]
 - 1) Determine the concentration of particulate matter according to the following test methods in Appendix A to 40 CFR Part 60. [§2103.12.h.6; §63.7322(b)(1)]

- a) Method 1 to select sampling port locations and the number of traverse points. Sampling sites must be located at the outlet of the control device and prior to any releases to the atmosphere.
 - b) Method 2, 2F, or 2G to determine the volumetric flow rate of the stack gas.
 - c) Method 3, 3A, or 3B to determine the dry molecular weight of the stack gas.
 - d) Method 4 to determine the moisture content of the stack gas.
 - e) Method 5 or 5D, as applicable, to determine the concentration of front half particulate matter in the stack gas.
- 2) During each particulate matter test run, sample only during periods of actual pushing when the capture system fan and control device are engaged. Collect a minimum sample volume of 50 dry standard cubic feet of gas during each test run. Three valid test runs are needed to comprise a performance test. Each run must start at the beginning of a push and finish at the end of a push (i.e., sample for an integral number of pushes) [§2103.12.h.6; §63.7322(b)(2)].
 - 3) Determine the total combined weight in tons of coke pushed during the duration of each test run according to the procedures in your source test plan for calculating coke yield from the quantity of coal charged to an individual oven. [§2103.12.h.6; §63.7322(b)(3)]
 - 4) Compute the process-weighted mass emissions (E_p) for each test run using Equation 1 of this section as follows: [§2103.12.h.6; §63.7322(b)(4)]

$$E_p = \frac{C \times Q \times T}{P \times K}$$

Where:

E_p = Process weighted mass emissions of particulate matter, lb/ton;

C = Concentration of particulate matter, gr/dscf;

Q = Volumetric flow rate of stack gas, dscf/hr;

T = Total time during a run that a sample is withdrawn from the stack during pushing, hr;

P = Total amount of coke pushed during the test run, tons; and

K = Conversion factor, 7,000 gr/lb.

- e. For each capture system applied to pushing emissions, the permittee shall establish a site-specific operating limit for the fan motor amperes or volumetric flow rate according to the procedures in Condition V.H.2.e.(1) or (2) below: [§2103.12.h.6; §63.7323(c)]
 - 1) If you elect the operating limit in V.H.1.d.1) above for fan motor amperes, measure and record the fan motor amperes during each push sampled for each particulate matter test run. Your operating limit is the lowest fan motor amperes recorded during any of the three runs that meet the emission limit.
 - 2) If you elect the operating limit in V.H.1.d.2) above for volumetric flow rate, measure and record the total volumetric flow rate at the inlet of the control device during each push sampled for each particulate matter test run. Your operating limit is the lowest volumetric flow rate recorded during any of the three runs that meet the emission limit.
- f. The permittee may change the operating limit for a capture system if you meet the requirements in Conditions V.H.2.f.(1) through (3) below: [§2103.12.h.6; §63.7323(e)]
 - 1) Submit a written notification to the Department of your request to conduct a new

- performance test to revise the operating limit.
 - 2) Conduct a performance test to demonstrate that emissions of particulate matter from the control device do not exceed the applicable limit in §63.7290(a).
 - 3) Establish revised operating limits according to the applicable procedures in Condition V.H.2.e above
 - g. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)
- 3. Monitoring Requirements:**
- a. The permittee shall continuously monitor and record the differential pressure drop across each baghouse module. [§2103.12.i; §2103.12.h.1 and §2103.12.i]
 - b. The permittee shall inspect the Battery B PEC System weekly to insure compliance with conditions V.H.1.b above. [§2103.12.i; §2103.12.h.1 and §2103.12.i]
 - c. The permittee shall meet each of the following requirements in paragraphs V.H.3.c.1) through V.H.3.c.6) below for each coke oven battery. [§2103.12.i; 63.7291(a)]
 - 1) Observe and record the opacity of fugitive pushing emissions from each oven at least once every 90 days. If an oven cannot be observed during a 90-day period due to circumstances that were not reasonably avoidable, you must observe the opacity of the first push of that oven following the close of the 90-day period that is capable of being observed in accordance with the procedures in §63.7334(a), and you must document why the oven was not observed within a 90-day period. All opacity observations of fugitive pushing emissions for batteries with vertical flues must be made using the procedures in §63.7334(a).
 - 2) Observe and record the opacity of fugitive pushing emissions for at least four consecutive pushes per battery each day. Exclude any push during which the observer's view is obstructed or obscured by interferences and observe the next available push to complete the set of four pushes. If necessary due to circumstances that were not reasonably avoidable, you may observe fewer than four consecutive pushes in a day; however, you must observe and record as many consecutive pushes as possible and document why four consecutive pushes could not be observed. You may observe and record one or more non-consecutive pushes in addition to any consecutive pushes observed in a day.
 - 3) Do not alter the pushing schedule to change the sequence of consecutive pushes to be observed on any day. Keep records indicating the legitimate operational reason for any change in your pushing schedule which results in a change in the sequence of consecutive pushes observed on any day.
 - 4) If the average opacity for any individual push exceeds 30 percent opacity for any short battery or 35 percent opacity for any tall battery, you must take corrective action and/or increase coking time for that oven. You must complete corrective action or increase coking time within either 10 calendar days or the number of days determined using Equation 1 of this section, whichever is greater:

$$X = 0.55 * Y \text{ (Eq. 1)}$$

Where:

X = Number of calendar days allowed to complete corrective action or increase coking time;
and

Y = Current coking time for the oven, hours.

For the purpose of determining the number of calendar days allowed under Equation 1 of this section, day one is the first day following the day you observed an opacity in excess of 30 percent for any short battery or 35 percent for any tall battery. Any fraction produced by Equation 1 of this section must be counted as a whole day. Days during which the oven is removed from service are not included in the number of days allowed to complete corrective action.

5) The permittee shall demonstrate that:

- a) The corrective action and/or increased coking time was successful. After a period of time no longer than the number of days allowed in condition V.H.3.c.4) above, observe and record the opacity of the first two pushes for the oven capable of being observed using the procedures in §63.7334(a). The corrective action and/or increased coking time was successful if the average opacity for each of the two pushes is 30 percent or less for a short battery or 35 percent or less for a tall battery. If the corrective action and/or increased coking time was successful, you may return the oven to the 90-day reading rotation described in condition V.H.3.c.1) above. If the average opacity of either push exceeds 30 percent for a short battery or 35 percent for a tall battery, the corrective action and/or increased coking time was unsuccessful, and you must complete additional corrective action and/or increase coking time for that oven within the number of days allowed in condition V.H.3.c.4) above.
- b) After implementing any additional corrective action and/or increased coking time required under condition V.H.3.c.5)a) or V.H.3.c.6)b) below, the permittee must demonstrate that corrective action and/or increased coking time was successful. After a period of time no longer than the number of days allowed in condition V.H.3.c.4) above, you must observe and record the opacity of the first two pushes for the oven capable of being observed using the procedures in §63.7334(a). The corrective action and/or increased coking time was successful if the average opacity for each of the two pushes is 30 percent or less for a short battery or 35 percent or less for a tall battery. If the corrective action and/or increased coking time was successful, you may return the oven to the 90-day reading rotation described in paragraph V.H.3.c.1) above. If the average opacity of either push exceeds 30 percent for a short battery or 35 percent for a tall battery, the corrective action and/or increased coking time was unsuccessful, and you must follow the procedures in paragraph V.H.3.c.5)c) below.
- c) If the corrective action and/or increased coking time was unsuccessful as described in condition V.H.3.c.5)b) above, the permittee must repeat the procedures in paragraph V.H.3.c.5)b) above until the corrective action and/or increased coking time is successful. You must report to the permitting authority as a deviation each unsuccessful attempt at corrective action and/or increased coking time under paragraph V.H.3.c.5)b) above.
- 6) If at any time the permittee places an oven on increased coking time as a result of fugitive pushing emissions that exceed 30 percent for a short battery or 35 percent for a tall battery, you must keep the oven on the increased coking time until the oven qualifies for decreased

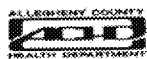
coking time using one of the following procedures:

- a) To qualify for a decreased coking time for an oven placed on increased coking time in accordance with condition V.H.3.c.4) or V.H.3.c.5) above, you must operate the oven on the decreased coking time. After no more than two coking cycles on the decreased coking time, you must observe and record the opacity of the first two pushes that are capable of being observed using the procedures in §63.7334(a). If the average opacity for each of the two pushes is 30 percent or less for a short battery or 35 percent or less for a tall battery, you may keep the oven on the decreased coking time and return the oven to the 90-day reading rotation described in condition V.H.3.c.1) above. If the average opacity of either push exceeds 30 percent for a short battery or 35 percent for a tall battery, the attempt to qualify for a decreased coking time was unsuccessful. You must then return the oven to the previously established increased coking time, or implement other corrective action(s) and/or increased coking time. If you implement other corrective action and/or a coking time that is shorter than the previously established increased coking time, you must follow the procedures in condition V.H.3.c.5)b) above to confirm that the corrective action(s) and/or increased coking time was successful.
- b) If the attempt to qualify for decreased coking time was unsuccessful as described in condition V.H.3.c.6)a) above, you may again attempt to qualify for decreased coking time for the oven. To do this, you must operate the oven on the decreased coking time. After no more than two coking cycles on the decreased coking time, you must observe and record the opacity of the first two pushes that are capable of being observed using the procedures in §63.7334(a). If the average opacity for each of the two pushes is 30 percent or less for a short battery or 35 percent or less for a tall battery, you may keep the oven on the decreased coking time and return the oven to the 90-day reading rotation described in condition V.H.3.c.1) above. If the average opacity of either push exceeds 30 percent for a short battery or 35 percent for a tall battery, the attempt to qualify for a decreased coking time was unsuccessful. You must then return the oven to the previously established increased coking time, or implement other corrective action(s) and/or increased coking time. If you implement other corrective action and/or a coking time that is shorter than the previously established increased coking time, you must follow the procedures in condition V.H.3.c.5)b) above to confirm that the corrective action(s) and/or increased coking time was successful.
- c) The permittee must report to the permitting authority as a deviation the second and any subsequent consecutive unsuccessful attempts on the same oven to qualify for decreased coking time as described in paragraph V.H.3.c.6)b) above.
- d. As provided in §63.6(g), the permittee may request to use an alternative to the work practice standards in Condition V.H.3.c above. [§2103.12.i; §2103.12.h.6; §63.7291(b)]
- e. The permittee shall prepare and operate at all times according to a written operation and maintenance plan for each capture system and control device applied to pushing emissions from coke battery(s). Each plan must address at a minimum the following elements. [§2103.12.i; §2103.12.h.6; §63.7300(c)]
- 1) Monthly inspections of the equipment that are important to the performance of the total capture system (e.g., pressure sensors, dampers, and damper switches). This inspection must include observations of the physical appearance of the equipment (e.g., presence of holes in

ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). In the event a defect or deficiency is found in the capture system (during a monthly inspection or between inspections), you must complete repairs within 30 days after the date that the defect or deficiency is discovered. If you determine that the repairs cannot be completed within 30 days, you must submit a written request for an extension of time to complete the repairs that must be received by the permitting authority not more than 20 days after the date that the defect or deficiency is discovered. The request must contain a description of the defect or deficiency, the steps needed and taken to correct the problem, the interim steps being taken to mitigate the emissions impact of the defect or deficiency, and a proposed schedule for completing the repairs. The request shall be deemed approved unless and until such time as the permitting authority notifies you that it objects to the request. The permitting authority may consider all relevant factors in deciding whether to approve or deny the request (including feasibility and safety). Each approved schedule must provide for completion of repairs as expeditiously as practicable, and the permitting authority may request modifications to the proposed schedule as part of the approval process.

- 2) Preventative maintenance for each control device, including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.
 - 3) Corrective action for all baghouses applied to pushing emissions. In the event a bag leak detection system alarm is triggered, you must initiate corrective action to determine the cause of the alarm within 1 hour of the alarm, initiate corrective action to correct the cause of the problem within 24 hours of the alarm, and complete the corrective action as soon as practicable. Actions may include, but are not limited to:
 - a) Inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions.
 - b) Sealing off defective bags or filter media.
 - c) Replacing defective bags or filter media or otherwise repairing the control device.
 - d) Sealing off a defective baghouse compartment.
 - e) Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system.
 - f) Shutting down the process producing the particulate emissions
- f. For the PEC system baghouse applied to pushing emissions from a coke oven battery, the permittee shall at all times monitor the relative change in particulate matter loadings using a bag leak detection system according to the requirements in V.H.3.g below and conduct inspections at their specified frequency according to the following requirements: [§2103.12.i; §2103.12.h.6; §63.7330(a)]
- 1) Monitor the pressure drop across each baghouse cell each day to ensure pressure drop is within the normal operating range identified in the manual;
 - 2) Confirm that dust is being removed from hoppers through weekly visual inspections or equivalent means of ensuring the proper functioning of removal mechanisms;
 - 3) Check the compressed air supply for pulse-jet baghouses each day;
 - 4) Monitor cleaning cycles to ensure proper operation using an appropriate methodology;
 - 5) Check bag cleaning mechanisms for proper functioning through monthly visual inspection or equivalent means;
 - 6) Make monthly visual checks of bag tension on reverse air and shaker-type baghouses to ensure that bags are not kinked (kneaded or bent) or laying on their sides. You do not have to

- make this check for shaker-type baghouses using self-tensioning (spring-loaded) devices;
 - 7) Confirm the physical integrity of the baghouse through quarterly visual inspections of the baghouse interior for air leaks; and
 - 8) Inspect fans for wear, material buildup, and corrosion through quarterly visual inspections, vibration detectors, or equivalent means.
- g. The permittee shall install, operate, and maintain a bag leak detection system on the PEC baghouse system according to the following requirements: [§2103.12.i; §2103.12.h.6; §63.7331(a)]
 - 1) The system must be certified by the manufacturer to be capable of detecting emissions of particulate matter at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less;
 - 2) The system must provide output of relative changes in particulate matter loadings;
 - 3) The system must be equipped with an alarm that will sound when an increase in relative particulate loadings is detected over a preset level. The alarm must be located such that it can be heard by the appropriate plant personnel;
 - 4) Each system that works based on the triboelectric effect must be installed, operated, and maintained in a manner consistent with the guidance document, "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015, September 1997). You may install, operate, and maintain other types of bag leak detection systems in a manner consistent with the manufacturer's written specifications and recommendations;
 - 5) To make the initial adjustment of the system, establish the baseline output by adjusting the sensitivity (range) and the averaging period of the device. Then, establish the alarm set points and the alarm delay time;
 - 6) Following the initial adjustment, do not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time, except as detailed in your operation and maintenance plan. Do not increase the sensitivity by more than 100 percent or decrease the sensitivity by more than 50 percent over a 365-day period unless a responsible official certifies, in writing, that the baghouse has been inspected and found to be in good operating condition; and
 - 7) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- h. For each CPMS required in V.H.3.m below, you must develop and make available for inspection upon request by the permitting authority a site-specific monitoring plan that addresses the requirements in Conditions V.H.3.h.1) through V.H.3.h.6) below: [§2103.12.i; §2103.12.h.6; §63.7331(b)]
 - 1) Installation of the CPMS sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);
 - 2) Performance and equipment specifications for the sample interface, the parametric signal analyzer, and the data collection and reduction system;
 - 3) Performance evaluation procedures and acceptance criteria (e.g., calibrations);
 - 4) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1), (3), (4)(ii), (7), and (8);
 - 5) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d); and
 - 6) Ongoing recordkeeping and reporting procedures in accordance the general requirements of §63.10(c), (e)(1), and (e)(2)(i).

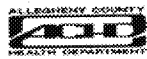


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- i. The permittee shall conduct a performance evaluation of each CPMS in accordance with your site-specific monitoring plan. [§2103.12.i; §2103.12.h.6; §63.7331(c)]
- j. The permittee shall operate and maintain each CPMS in continuous operation according to the site-specific monitoring plan. [§2103.12.i; §2103.12.h.6; §63.7331(d)]
- k. If the permittee elects the operating limit in V.H.1.d.1) above for a capture system applied to pushing emissions, you must install, operate, and maintain a device to measure the fan motor amperes. [§2103.12.i; §2103.12.h.6; §63.7331(g)]
- l. If the permittee elects the operating limit in V.H.1.d.2) above for a capture system applied to pushing emissions, you must install, operate, and maintain a device to measure the total volumetric flow rate at the inlet of the control device. [§2103.12.i; §2103.12.h.6; §63.7331(h)]
- m. For each capture system applied to pushing emissions, the permittee shall at all times monitor the fan motor amperes according to the requirements in Condition V.H.3.k above or the volumetric flow rate according to the requirements in Condition V.H.3.l above. [§2103.12.i; §2103.12.h.6; §63.7330(d)]
- n. Except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including as applicable, calibration checks and required zero and span adjustments), the permittee shall monitor continuously (or collect data at all required intervals) at all times the affected source is operating. [§2103.12.i; §2103.12.h.6; §63.7332(a)]
- o. The permittee shall not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels, or in fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitor to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§2103.12.i; §2103.12.h.6; §63.7332(b)]
- p. For each capture system applied to pushing emissions and subject to the operating limit in Condition V.H.1.d above, the permittee shall demonstrate continuous compliance by meeting the requirements in Condition V.H.3.p.1) or V.H.3.p.2) below: [§2103.12.i; §2103.12.h.6; §63.7333(d)]
 - 1) If the permittee elects the operating limit for fan motor amperes in V.H.1.d.1) above:
 - a) Maintaining the daily average fan motor amperes at or above the minimum level established during the initial or subsequent performance test; and
 - b) Checking the fan motor amperes at least every 8 hours to verify the daily average is at or above the minimum level established during the initial or subsequent performance test and recording the results of each check.
 - 2) If the permittee elects the operating limit for volumetric flow rate in V.H.1.d.2) above:
 - a) Maintaining the daily average volumetric flow rate at the inlet of the control device at or above the minimum level established during the initial or subsequent performance test; and
 - b) Checking the volumetric flow rate at least every 8 hours to verify the daily average is at or above the minimum level established during the initial or subsequent performance test and recording the results of each check.

- q. The permittee shall demonstrate continuous compliance with the work practice standards for fugitive pushing emissions according to the following requirements: [§2103.12.i; §2103.12.h.6; §63.7334(a)]
- 1) Observe and record the opacity of fugitive emissions for four consecutive pushes per operating day, except you may make fewer or non-consecutive observations as permitted by Condition V.H.3.c.2) above. Maintain records of the pushing schedule for each oven and records indicating the legitimate operational reason for any change in the pushing schedule according to Condition V.H.3.c.3) above.
 - 2) Observe and record the opacity of fugitive emissions from each oven in a battery at least once every 90 days. If an oven cannot be observed during a 90-day period, observe and record the opacity of the first push of that oven following the close of the 90-day period that can be read in accordance with the procedures in conditions V.H.3.q.1) through V.H.3.q.8).
 - 3) Make all observations and calculations for opacity observations of fugitive pushing emissions in accordance with Method 9 in Appendix A to 40 CFR Part 60 using a Method 9 certified observer unless you have an approved alternative procedure under V.H.3.q.7) below.
 - 4) Record pushing opacity observations at 15-second intervals as required in section 2.4 of Method 9 (Appendix A to 40 CFR Part 60). The requirement in section 2.4 of Method 9 for a minimum of 24 observations does not apply, and the data reduction requirements in section 2.5 of Method 9 do not apply. The requirement in §63.6(h)(5)(ii) for obtaining at least 3 hours of observations (thirty 6-minute averages) to demonstrate initial compliance does not apply.
 - 5) If fewer than six but at least four 15-second observations can be made, use the average of the total number of observations to calculate average opacity for the push. Missing one or more observations during the push (e.g., as the quench car passes behind a building) does not invalidate the observations before or after the interference for that push. However, a minimum of four 15-second readings must be made for a valid observation.
 - 6) Begin observations for a push at the first detectable movement of the coke mass. End observations of a push when the quench car enters the quench tower.
 - a) For a battery with a coke-side shed, the observer must be in a position that provides an unobstructed view and avoids interferences from the topside of the battery. Typical interferences to avoid include emissions from open standpipes and charging. Observations must include any fugitive emissions that escape from the top of the shed, from the ends of the shed, or from the area where the shed is joined to the battery. If the observer does not have a clear view to identify when a push starts or ends, a second person can be positioned to signal the start or end of the push and notify the observer when to start or end the observations. Radio communications with other plant personnel (e.g., pushing ram operator or quench car operator) may also serve to notify the observer of the start or end of a push. Record the oven number of any push not observed because of obstructions or interferences.
 - b) You may reposition after the push to observe emissions during travel if necessary.
 - 7) If it is infeasible to implement the procedures in Conditions V.H.3.q.1) through V.H.3.q.6) above for an oven due to physical obstructions, nighttime pushes, or other reasons, you may apply to the Department for permission to use an alternative procedure. The application must provide a detailed explanation of why it is infeasible to use the procedures in Conditions V.H.3.q.1) through V.H.3.q.6) above, identify the oven and battery numbers, and describe the alternative procedure. An alternative procedure must identify whether the coke in that oven is not completely coked, either before, during, or after an oven is pushed.
 - 8) For each oven observed that exceeds an opacity of 30 percent for any short battery or 35



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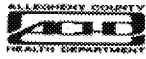
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percent for any tall battery, you must take corrective action and/or increase the coking time in accordance with Condition V.H.3.c above. Maintain records documenting conformance with Condition V.H.3.c above.

- r. To demonstrate continuous compliance with the operation and maintenance requirements for a baghouse applied to pushing emissions from a coke oven battery in V.H.3.g above, the permittee shall inspect and maintain each baghouse according to the requirements in Conditions V.H.3.g.1) through V.H.3.g.7) above and record all information needed to document conformance with these requirements. If you increase or decrease the sensitivity of the bag leak detection system beyond the limits specified in Condition V.H.3.g.6) above, you must include a copy of the required written certification by a responsible official in the next semiannual compliance report. [§2103.12.i; §2103.12.h.6; §63.7335(c)]

4. Record Keeping Requirements:

- a. The results of the inspections required by condition V.H.3.b above shall be recorded weekly along with the differential pressure drop across the baghouse [§2103.12.j.1].
- b. Episodes of non-compliance with conditions V.H.1.a through V.H.1.f and V.H.3.b above and corrective actions taken shall be recorded upon occurrence. [§2103.12.j; §2103.12.h.1.]
- c. The permittee shall keep records of each baghouse maintenance inspection and repair, replacement or other corrective action. [§2103.12.j.1]
- d. The permittee shall keep the following records: [§2103.12.j; §2103.12.h.6; §63.7342(a)]
- 1) A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any initial notification or notification of compliance status that you submitted, according to the requirements in §63.10(b)(2)(xiv).
 - 2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - 3) Records of performance tests, performance evaluations, and opacity observations as required in §63.10(b)(2)(viii).
- e. For each COMS or CEMS, the permittee shall keep the following records. [§2103.12.j; §2103.12.h.6; §63.7342(b)]
- 1) Records described in §63.10(b)(2)(vi) through (xi).
 - 2) Monitoring data for COMS during a performance evaluation as required in §63.6(h)(7)(i) and (ii).
 - 3) Previous (that is, superseded) versions of the performance evaluation plan as required in §63.8(d)(3).
 - 4) Records of the date and time that each deviation started and stopped and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period.
- f. The permittee shall keep the records in §63.6(h)(6) for visual observations. [§2103.12.j; §2103.12.h.6; §63.7342(c)]
- g. The permittee shall keep the records required in Conditions V.H.3.p through V.H.3.r above and V.H.4.k through V.H.4.m below to show continuous compliance with each emission limitation,



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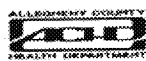
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work practice standard, and operation and maintenance requirement that applies to you. [§2103.12.j; §2103.12.h.6; §63.7342(d)]

- h. The permittee shall keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§2103.12.j; §2103.12.h.6; §63.7343(a)]
- i. As specified in §63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§2103.12.j; §2103.12.h.6; §63.7343(b); 2103.12.j.2]
- j. The permittee shall keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years. [§2103.12.j; §2103.12.h.6; §63.7343(c)]
- k. For each coke oven battery with a capture system or control device applied to pushing emissions, the permittee shall demonstrate continuous compliance with the operation and maintenance requirements in Condition V.H.3.e.1) above by meeting the following requirements: [§2103.12.j; §2103.12.h.6; §63.7335(b)]
 - 1) Making monthly inspections of capture systems according to Condition V.H.3.e.1) above and recording all information needed to document conformance with these requirements; Performing preventative maintenance for each control device according to Condition V.H.3.e.2) above and recording all information needed to document conformance with these requirements; and
 - 2) Initiating and completing corrective action for a bag leak detection system alarm according to Condition V.H.3.e.3) and recording all information needed to document conformance with these requirements. This includes records of the times the bag leak detection system alarm sounds, and for each valid alarm, the time you initiated corrective action, the corrective action(s) taken, and the date on which corrective action is completed.
- l. The permittee shall inspect and maintain the pushing emission control baghouse as required in V.H.3.g.1) through V.H.3.g.7) above and record all information needed to document conformance with these requirements. If you increase or decrease the sensitivity of the bag leak detection system beyond the limits specified in V.H.3.g.6) above, you must include a copy of the required written certification by a responsible official in the next semiannual compliance report. [§2103.12.j; 63.7335(c)]
- m. The permittee shall maintain a current copy of the operation and maintenance plans required in §63.7300(b) and (c) onsite and available for inspection upon request. The plans shall be kept for the life of the affected source or until the affected source is no longer subject to the requirements of 40 CFR Part 63, Subpart CCCCC. [§2103.12.j; 63.7335(d)]

5. Reporting Requirements:

- a. The permittee shall report all instances of non-compliance with conditions V.H.1.a through V.H.1.f, V.H.3.a and V.H.3.b, and V.H.4.a through V.H.4.c above along with all corrective action taken to restore the subject equipment to compliance, to the Department every six months. [(§2103.12.k.1)]
- b. Reporting instances of non-compliance in accordance with condition V.H.5.a above does not



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relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition 5, if appropriate. [§2103.12.k.1; §2108.01.c.]

- c. No later than twenty (20) days after the end of each month, a written report of a summary of the following during each such month shall be submitted to the Department: [§2103.12.k; §2109.03 and Enforcement Order 202.E, 3/28/90]
- 1) For each individual coke battery or group of batteries served by the same push emission control system, and for all coke batteries combined:
 - a. The total number of pushes for the month;
 - b. The total number of controlled pushes for the month; and the monthly percentage availability (on-line time) of the pushing control system, based on the total number of pushes and total number of controlled pushes.
 - 2) For each outage of the pushing control system at each individual coke battery or group of batteries served by the same pushing emission control system:
 - a. The batteries affected;
 - b. The starting and ending dates and times;
 - c. The total time of each outage, to the nearest tenth of an hour;
 - d. The corresponding Department Breakdown Number; and the reason(s) or cause(s) for the outage.
- d. The permittee shall report each instance in which you did not meet each emission limitation in Conditions, V.H.1.c, V.H.1.d and V.H.1.e was not met. This includes periods of startup, shutdown, and malfunction. The permittee shall also report each instance in which the permittee did not meet each work practice standard or operation and maintenance requirement in Conditions V.H.6.a, V.H.6.b and V.H.6.c. These instances are deviations from the emission limitations (including operating limits), work practice standards, and operation and maintenance requirements of 40 CFR Part 63, Subpart CCCCC. These deviations must be reported according to the requirements in V.H.5.h through V.H.5.k below. [§2103.12.k; §2103.12.h.6; §63.7336(a)]
- e. During periods of startup, shutdown, and malfunction, the permittee must operate in accordance with your startup, shutdown, and malfunction plan. [§2103.12.k; §2103.12.h.6; §63.7336(b)]
- 1) Consistent with §63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if you demonstrate to the Department's satisfaction that you were operating in accordance with the startup, shutdown, and malfunction plan.
 - 2) The Department will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in §63.6(e).
- f. The permittee shall submit all of the notifications in §63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e) and (f)(4), and 63.9(b) through (h) that apply to you by the specified dates. [§2103.12.k; §2103.12.h.6; §63.7340(a)]
- g. If you are required to conduct a performance test, the permittee shall submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in §63.7(b)(1). [§2103.12.k; §2103.12.h.6; §63.7340(d)]

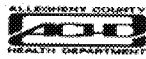
- h. Unless the Department has approved a different schedule, the permittee must submit semiannual compliance reports for the PEC stacks to the Department according to the requirements in Conditions V.H.5.h.1) and V.H.5.h.2) below: [§2103.12.k; §2103.12.h.6; §63.7341(a)]
 - 1) Each semiannual compliance report shall cover the semiannual reporting period as specified in General Condition III.15.d above. All semiannual compliance reports must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - 2) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the Department has established instead of according to the dates in Conditions V.H.5.h.1) above.
- i. Each semiannual compliance report must provide information on compliance with the emission limitations, work practice standards, and operation and maintenance requirements for all affected sources except battery stacks. The reports must include the information in V.H.5.i.1) through V.H.5.i.3) below, and as applicable, Conditions V.H.5.i.4) through V.H.5.i.8) below. [§2103.12.k; §2103.12.h.6; §63.7341(c)]
 - 1) Company name and address.
 - 2) Statement by a responsible official, with the official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - 3) Date of report and beginning and ending dates of the reporting period.
 - 4) If there was a startup, shutdown, or malfunction during the reporting period and the permittee took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
 - 5) If there were no deviations from the continuous compliance requirements in Conditions V.H.3.p through V.H.3.r above and V.H.4.k through V.H.4.m above, a statement that there were no deviations from the emission limitations, work practice standards, or operation and maintenance requirements during the reporting period.
 - 6) If there were no periods during which a continuous monitoring system (including COMS, continuous emission monitoring system (CEMS), or CPMS) was out-of-control as specified in §63.8(c)(7), a statement that there were no periods during which a continuous monitoring system was out-of-control during the reporting period.
 - 7) For each deviation from an emission limitation in 40 CFR 63, Subpart CCCCC) and for each deviation from the requirements for work practice standards in 40 CFR Part 63, Subpart CCCCC that occurs at an affected source where the permittee is not using a continuous monitoring system (including a COMS, CEMS, or CPMS) to comply with the emission limitations in this subpart, the compliance report must contain the information in Conditions V.H.5.i.5)4), V.H.5.i.7)a) and V.H.5.i.7)b) below. This includes periods of startup, shutdown, and malfunction.
 - a) The total operating time of each affected source during the reporting period.
 - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable and the corrective action taken.
 - 8) For each deviation from an emission limitation occurring at an affected source the permittee is using a continuous monitoring system (including COMS, CEMS, or CPMS) to comply with the emission limitation 40 CFR 63, Subpart CCCCC, the permittee must include the information in Conditions V.H.5.i.5)4), V.H.5.i.8)a) through V.H.5.i.8)l) below. This

includes periods of startup, shutdown, and malfunction.

- a) The date and time that each malfunction started and stopped.
 - b) The date and time that each continuous monitoring system (including COMS, CEMS, or CPMS) was inoperative, except for zero (low-level) and high-level checks.
 - c) The date, time, and duration that each continuous monitoring system (including COMS, CEMS, or CPMS) was out-of-control, including the information in §63.8(c)(8).
 - d) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.
 - e) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
 - f) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
 - g) A summary of the total duration of continuous monitoring system downtime during the reporting period and the total duration of continuous monitoring system downtime as a percent of the total source operating time during the reporting period.
 - h) An identification of each HAP that was monitored at the affected source.
 - i) A brief description of the process units.
 - j) A brief description of the continuous monitoring system.
 - k) The date of the latest continuous monitoring system certification or audit.
 - l) A description of any changes in continuous monitoring systems, processes, or controls since the last reporting period.
- j. If the permittee had a startup, shutdown, or malfunction during the semiannual reporting period that was not consistent with your startup, shutdown, and malfunction plan, you must submit an immediate startup, shutdown, and malfunction report according to the requirements in §63.10(d)(5)(ii). [§2103.12.k; §2103.12.h.6; §63.7341(d)]
- k. If the permittee submits a compliance report for an affected source along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the compliance report includes all the required information concerning deviations from any emission limitation or work practice standard in 40 CFR Part 63, Subpart CCCCC, submission of the compliance report satisfies any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report does not otherwise affect any obligation you may have to report deviations from permit requirements to the Department. [§2103.12.k; §2103.12.h.6; §63.7341(e)]

6. Work Practice Standards:

- a. The permittee shall develop and implement a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63, Subpart A, §63.6(e)(3). [§2103.12.h.6; §63.7310(c)].
- b. As required by §63.6(e)(1)(i), the permittee shall operate and maintain each coke battery including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by 40 CFR Part 63, Subpart CCCCC. [§2103.12.h.6; §63.7300(a)]
- c. The permittee shall be in compliance with the emission limitations, work practice standards, and operation and maintenance requirements of 40 CFR 63, Subpart CCCCC at all times, except during periods of startup, shutdown, and malfunction as defined in §63.2. [§2103.12.h.6;



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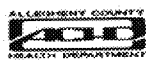
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§63.7310(a)]

7. Additional Requirements:

- a. The definitions in 40 CFR 63.7352 are hereby incorporated into this permit by reference.

PERMIT SHIELD IN EFFECT



**EMISSION UNIT TERMS
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I. Quench Towers No. 1, 5, 7 and B: P013 & P015 through P017

Process Description: Water quenching of incandescent coke from Batteries No. 1, 2, 3, 13, 14, 15, 19, 20 and B
Facility IDs: P013 & 15 through P017
Raw Materials: Incandescent coke, water
Control Device: Baffles installed in the quench tower to capture entrained water droplets

1. Restrictions:

- a. The permittee shall not quench, or allow the quenching of, coke unless the emissions from such quenching are vented through a baffled quench tower and the water used for such quenching is equivalent to, or better than, the water quality standards established for the nearest stream or river by regulations promulgated by the DEP under the Pennsylvania Clean Streams Law, Act of June 22, 1937, PL. 1987, as amended, 35 P.S. 691.1 et seq., except that water from the nearest stream or river may be used for the quenching of coke. The nearest stream or river to the USX Corporation facility in Clairton, PA, shall be the Monongahela River. [§2105.21.g]
- b. The permittee shall meet the following requirements for each quench tower and backup quench station: [§2103.12.h.6; §63.7295(a)]
 - 1) For the quenching of hot coke, the permittee shall meet one of the following requirements: [§2103.12.h.6; §63.7295(a)(1)]
 - a) The concentration of total dissolved solids (TDS) in the water used for quenching must not exceed 1,100 milligrams per liter (mg/L); or
 - b) The sum of the concentrations of benzene, benzo (a) pyrene, and naphthalene in the water used for quenching must not exceed the applicable site-specific limit approved by the Department.
 - 2) The permittee shall use acceptable makeup water, as defined in §63.7352, for quenching [§2103.12.h.6; §63.7295(a)(2)].
- c. For each by-product coke oven batteries subject to the requirements for quench water in V.I.1.b.1), above, the permittee shall submit a notification of compliance status containing the results of the quench water performance test (TDS or constituent limit) before the close of business on the 30th calendar days following the completion of the compliance demonstration. For each particulate matter emission limitation that applies to you, the permittee shall submit a notification of compliance status containing the results of the performance test before the close of business on the 60th calendar days following completion of the performance test according to §63.10(d)(2). [§2103.12.h.6; §63.7326(d)]

2. Testing Requirements:

- a. The permittee shall conduct performance tests to demonstrate compliance with the TDS limit or constituent limit for quench water in V.I.1.b.1) or §63.7295(a)(1) by April 14, 2006 [§2103.12.h.6; §63.7320(b) and §63.7283(a)]
- b. If the permittee elects the TDS limit for quench water in V.I.1.b.1)a) above, the permittee shall conduct each performance test according to the following conditions: [§2103.12.h.6;

§63.7325(a)]

- 1) Take the quench water sample from a location that provides a representative sample of the quench water as applied to the coke (e.g., from the header that feeds water to the quench tower reservoirs). Conduct sampling under normal and representative operating conditions.
 - 2) Determine the TDS concentration of the sample using Method 160.1 in 40 CFR Part 136.3 (see "residue—filterable"), except that you must dry the total filterable residue at 103 to 105 [deg] C (degrees Centigrade) instead of 180 [deg] C.
- c. If at any time the permittee elects to meet the alternative requirements for quench water in V.I.1.b.1)b) above, the permittee shall establish a site-specific constituent limit according to the procedures in Conditions V.I.2.c.1) through V.I.2.c.4) below: [§2103.12.h.6; §63.7325(b)]
- 1) Take a minimum of nine quench water samples from a location that provides a representative sample of the quench water as applied to the coke (e.g., from the header that feeds water to the quench tower reservoirs). Conduct sampling under normal and representative operating conditions.
 - 2) For each sample, determine the TDS concentration according to the requirements in Condition V.I.2.b above, and the concentration of benzene, benzo(a)pyrene, and naphthalene using the applicable methods in 40 CFR Part 136 or an approved alternative method.
 - 3) Determine and record the highest sum of the concentrations of benzene, benzo(a)pyrene, and naphthalene in any sample that has a TDS concentration less than or equal to the TDS limit of 1,100 mg/L. This concentration is the site-specific constituent limit.
 - 4) Submit the site-specific limit, sampling results, and all supporting data and calculations to Department for review and approval.
- d. If the permittee elects the constituent limit for quench water in V.I.1.b.1) above, the permittee shall conduct each performance test according to the conditions in Conditions V.I.2.d.1) and V.I.2.d.2) below: [§2103.12.h.6; §63.7325(c)]
- 1) Take a quench water sample from a location that provides a representative sample of the quench water as applied to the coke (e.g., from the header that feeds water to the quench tower reservoirs). Conduct sampling under normal and representative operating conditions.
 - 2) Determine the sum of the concentration of benzene, benzo(a)pyrene, and naphthalene in the sample using the applicable methods in 40 CFR Part 136 or an approved alternative method.
- e. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

- a. The permittee shall inspect the quench tower monthly for damaged or missing baffles and blockage and initiate repair or replacement of damaged or missing baffles within 30 days and complete as soon as practicable. [§2103.12.i]
- b. Beginning on the first day compliance is required under §63.7283, the permittee shall demonstrate continuous compliance with the TDS limit for quenching in §63.7295(a)(1)(i) by meeting the requirements in Conditions V.I.3.b.1) and V.I.3.b.2) below: [§2103.12.i; §2103.12.h.6; §63.7333(f)]

- 1) Maintaining the TDS content of the water used to quench hot coke at 1,100 mg/L or less; and
 - 2) Determining the TDS content of the quench water at least weekly according to the requirements in Condition V.I.2.b above and recording the sample results.
- c. The permittee shall demonstrate continuous compliance with the constituent limit for quenching in Condition V.I.1.b.2) above by meeting the following requirements: [§2103.12.i; 63.7333(g)]
- 1) Maintaining the sum of the concentrations of benzene, benzo(a)pyrene, and naphthalene in the water used to quench hot coke at levels less than or equal to the site-specific limit approved by the permitting authority; and
 - 2) Determining the sum of the constituent concentrations at least monthly according to the requirements in §63.7325(c) and recording the sample results.

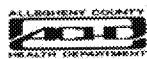
4. Record Keeping Requirements:

- a. The permittee shall maintain records of all quench tower inspections when missing or damaged baffles or blockages are discovered. [(§2103.12.j)]
- b. The permittee shall maintain records of all repairs or replacement of baffles. The record keeping shall include a description of the repair or replacement, the date repairs and/or replacements were initiated and the date repairs and/or replacements were completed. [(§2103.12.j)]
- c. The permittee shall keep the records required in Conditions V.I.3.a and V.I.3.b above and V.I.4.e below to show continuous compliance with each emission limitation, work practice standard, and operation and maintenance requirement that applies to you. [§2103.12.j; §2103.12.h.6; §63.7342(d)]
- d. The permittee shall keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§2103.12.j; §2103.12.h.6; §63.7343(a)]
- e. For each coke oven battery subject to the work practice standard for quenching in V.I.6.a below, you must demonstrate continuous compliance according to the requirements of Conditions V.I.4.e.1) through V.I.4.e.3) below: [§2103.12.j; §2103.12.h.6; §63.7334(e)]
 - 1) Maintaining baffles in each quench tower such that no more than 5 percent of the cross-sectional area of the tower is uncovered or open to the sky as required in Condition V.I.6.a.1) below;
 - 2) Maintaining records that document conformance with the washing, inspection, and repair requirements in Condition V.I.6.a.2) below, including records of the ambient temperature on any day that the baffles were not washed; and
 - 3) Maintaining records of the source of make-up water to document conformance with the requirement for acceptable make-up water in Condition V.I.1.b.2) above.

5. Reporting Requirements:

- a. The permittee shall submit semiannual reports to the Department in accordance General Condition III.15.d above of the record keeping information required in Conditions V.I.4.a and V.I.4.b above. [§2103.12.k; §2103.12.k]

- b. For each coke oven battery, the permittee shall demonstrate initial compliance with the work practice standards for quenching in Condition V.I.6.a below by certifying in your notification of compliance status that you have met the requirements of Conditions V.I.5.b.1) and V.I.5.b.2) below: [§2103.12.k; §2103.12.h.6; §63.7327(e)]
 - 1) Installed the required equipment in each quench tower; and
 - 2) You will meet each of the work practice requirements beginning no later than April 14, 2006
- c. Unless the Department has approved a different schedule, the permittee must submit semiannual compliance reports for the quench towers to the Department according to the requirements in Conditions V.I.5.c.1) and V.I.5.c.2) below: [§2103.12.k; §2103.12.h.6; §63.7341(a)]
 - 1) Each semiannual compliance report shall cover the semiannual reporting period as specified in General Condition III.15.d above. All semiannual compliance reports must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - 2) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in Conditions V.I.5.c.1) above.
- d. *Semiannual compliance report contents.* Each compliance report must provide information on compliance with the emission limitations, work practice standards, and operation and maintenance requirements for the quench tower. The reports must include the information in Conditions V.I.5.d.1) through V.I.5.d.3) below, and as applicable, Conditions V.I.5.d.4) through V.I.5.d.6) below. [§63.7341(c)]
 - 1) Company name and address.
 - 2) Statement by a responsible official, with the official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - 3) Date of report and beginning and ending dates of the reporting period.
 - 4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
 - 5) If there were no deviations from the continuous compliance requirements in Conditions V.I.3.b, V.I.3.c and V.I.4.e above (for the quench tower), a statement that there were no deviations from the emission limitations, work practice standards, or operation and maintenance requirements during the reporting period.
 - 6) For each deviation from an emission limitation in 40 CFR 63, Subpart CCCCC (including quench water limits) and for each deviation from the requirements for work practice standards in 40 CFR 63, Subpart CCCCC that occurs at the quench tower, the compliance report must contain the information in Conditions V.I.5.d.4) and V.I.5.d.6)a) through V.I.5.d.6)b). This includes periods of startup, shutdown, and malfunction.
 - a) The total operating time of the quench tower during the reporting period.
 - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable and the corrective action taken.



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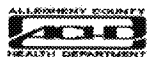
6. Work Practice Standards:

- a. For quench towers 1,5,7 and B, the permittee shall meet each of the following requirements: [§2103.12.h.6; §63.7295(b)]
 - 1) The permittee shall equip each quench tower with baffles such that no more than 5 percent of the cross sectional area of the tower may be uncovered or open to the sky.
 - 2) The permittee shall wash the baffles in each quench tower once each day that the tower is used to quench coke, except as specified in the following conditions:
 - a) You are not required to wash the baffles in a quench tower if the highest measured ambient temperature remains less than 30 degrees Fahrenheit throughout that day (24-hour period). If the measured ambient temperature rises to 30 degrees Fahrenheit or more during the day, you must resume daily washing according to the schedule in your operation and maintenance plan.
 - b) You must continuously record the ambient temperature on days that the baffles were not washed.
 - 3) Inspect each quench tower monthly for damaged or missing baffles and blockage.
 - 4) Initiate repair or replacement of damaged or missing baffles within 30 days and complete as soon as practicable.
- b. As provided in §63.6(g), the permittee may request to use an alternative to the work practice standards in Condition V.1.6.a above. [§2103.12.h.6; §63.7295(c)]

7. Additional Requirements:

None except as provided elsewhere.

PERMIT SHIELD IN EFFECT



EMISSION UNIT TERMS AND CONDITIONS

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J. Alternate Quench Towers No. 6 and 8 (P038 and P039):

Process Description: Water quenching of incandescent coke
Facility ID'S: P038 and P039
Raw Materials: Incandescent coke, water
Control Device: Baffles installed in the quench towers to capture entrained water droplets

1. Restrictions:

- a. The permittee shall not quench, or allow the quenching of, coke unless the emissions from such quenching are vented through a baffled quench tower and the water used for such quenching is equivalent to, or better than, the water quality standards established for the nearest stream or river by regulations promulgated by the DEP under the Pennsylvania Clean Streams Law, Act of June 22, 1937, PL. 1987, as amended, 35 P.S. 691.1 et seq., except that water from the nearest stream or river may be used for the quenching of coke. The nearest stream or river to the USX Corporation facility in Clairton, PA, shall be the Monongahela River. [§2105.21.g]
- b. The permittee shall meet the following requirements for each quench tower and backup quench station: [§2103.12.h.6; §63.7295(a)]
 - 1) For the quenching of hot coke, the permittee shall meet one of the following requirements: [§2103.12.h.6; §63.7295(a)(1)]
 - a) The concentration of total dissolved solids (TDS) in the water used for quenching must not exceed 1,100 milligrams per liter (mg/L); or
 - b) The sum of the concentrations of benzene, benzo (a) pyrene, and naphthalene in the water used for quenching must not exceed the applicable site-specific limit approved by the Department.
 - 2) The permittee shall use acceptable makeup water, as defined in §63.7352, for quenching [§2103.12.h.6; §63.7295(a)(2)].
- c. For each by-product coke oven batteries subject to the requirements for quench water in V.J.1.b.1), the permittee shall submit a notification of compliance status containing the results of the quench water performance test (TDS or constituent limit) before the close of business on the 30th calendar days following the completion of the compliance demonstration. For each particulate matter emission limitation that applies to you, the permittee shall submit a notification of compliance status containing the results of the performance test before the close of business on the 60th calendar days following completion of the performance test according to §63.10(d)(2). [§2103.12.h.6; §63.7326(d)]

2. Testing Requirements:

- a. The permittee shall conduct performance tests to demonstrate compliance with the TDS limit or constituent limit for quench water in §63.7295(a)(1) by April 14, 2006 [§2103.12.h.6; §63.7320(b) and §63.7283(a)]
- b. If the permittee elects the TDS limit for quench water in V.J.1.b.1)a), the permittee shall conduct each performance test according to the following conditions: [§2103.12.h.6; §63.7325(a)]
 - 1) Take the quench water sample from a location that provides a representative sample of the

- quench water as applied to the coke (e.g., from the header that feeds water to the quench tower reservoirs). Conduct sampling under normal and representative operating conditions.
- 2) Determine the TDS concentration of the sample using Method 160.1 in 40 CFR Part 136.3 (see "residue—filterable"), except that you must dry the total filterable residue at 103 to 105 [deg] C (degrees Centigrade) instead of 180 [deg] C.
- c. If at any time the permittee elects to meet the alternative requirements for quench water in V.J.1.b.1)b) above, the permittee shall establish a site-specific constituent limit according to the procedures in Conditions V.J.2.c.1) through V.J.2.c.4) below: [§2103.12.h.6; §63.7325(b)]
- 1) Take a minimum of nine quench water samples from a location that provides a representative sample of the quench water as applied to the coke (e.g., from the header that feeds water to the quench tower reservoirs). Conduct sampling under normal and representative operating conditions.
 - 2) For each sample, determine the TDS concentration according to the requirements in Condition V.J.2.b above, and the concentration of benzene, benzo(a)pyrene, and naphthalene using the applicable methods in 40 CFR Part 136 or an approved alternative method.
 - 3) Determine and record the highest sum of the concentrations of benzene, benzo(a)pyrene, and naphthalene in any sample that has a TDS concentration less than or equal to the TDS limit of 1,100 mg/L. This concentration is the site-specific constituent limit.
 - 4) Submit the site-specific limit, sampling results, and all supporting data and calculations to Department for review and approval.
- d. If the permittee elects the constituent limit for quench water in V.J.1.b.1)b), the permittee shall conduct each performance test according to the conditions in Conditions V.J.2.d.1) and V.J.2.d.2) below: [§2103.12.h.6; §63.7325(c)]
- 1) Take a quench water sample from a location that provides a representative sample of the quench water as applied to the coke (e.g., from the header that feeds water to the quench tower reservoirs). Conduct sampling under normal and representative operating conditions.
 - 2) Determine the sum of the concentration of benzene, benzo(a)pyrene, and naphthalene in the sample using the applicable methods in 40 CFR Part 136 or an approved alternative method
- e. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)
3. **Monitoring Requirements:**
- a. The permittee shall inspect the quench tower monthly for damaged or missing baffles and blockage and initiate repair or replacement of damaged or missing baffles within 30 days and complete as soon as practicable. [§2103.12.i]
 - b. Beginning on the first day compliance is required under §63.7283, the permittee shall demonstrate continuous compliance with the TDS limit for quenching in §63.7295(a)(1)(i) by meeting the requirements in Conditions V.J.3.b.1) and V.J.3.b.2): [§2103.12.h.6; §63.7333(f)]
 - 1) Maintaining the TDS content of the water used to quench hot coke at 1,100 mg/L or less; and
 - 2) Determining the TDS content of the quench water at least weekly according to the requirements in Condition V.J.2.b and recording the sample results.

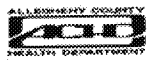
- c. The permittee shall demonstrate continuous compliance with the constituent limit for quenching in Condition V.J.1.b.1)b) by meeting the following requirements: [63.7333(g)]
 - 1) Maintaining the sum of the concentrations of benzene, benzo(a)pyrene, and naphthalene in the water used to quench hot coke at levels less than or equal to the site-specific limit approved by the permitting authority; and
 - 2) Determining the sum of the constituent concentrations at least monthly according to the requirements in §63.7325(c) and recording the sample results.

4. Record Keeping Requirements:

- a. The permittee shall maintain records of all quench tower inspections when missing or damaged baffles or blockages are discovered. [(§2103.12.j)]
- b. The permittee shall maintain records of all repairs or replacement of baffles. The record keeping shall include a description of the repair or replacement, the date repairs and/or replacements were initiated and the date repairs and/or replacements were completed. [(§2103.12.j)]
- c. The permittee shall keep the records required in Conditions V.J.3.a and V.J.3.b above to show continuous compliance with each emission limitation, work practice standard, and operation and maintenance requirement that applies to you. [§2103.12.j; §2103.12.h.6; §63.7342(d)]
- d. The permittee shall keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§2103.12.j; §2103.12.h.6; §63.7343(a)]

5. Reporting Requirements:

- a. At least every six (6) months, the permittee shall submit semiannual reports to the Department in accordance General Condition III.15.d above of the record keeping information required in Conditions V.J.4.a and V.J.4.b above. [§2103.12.k]
- b. Unless the Department has approved a different schedule, the permittee must submit semiannual compliance reports for the quench towers to the Department according to the requirements in Conditions V.J.5.b.1) and V.J.5.b.2) below: [§2103.12.k; §2103.12.h.6; §63.7341(a)]
 - 1) Each semiannual compliance report shall cover the semiannual reporting period as specified in General Condition III.15.d above. All semiannual compliance reports must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - 2) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in Conditions V.J.5.b.1) above.
- c. *Semiannual compliance report contents.* Each compliance report must provide information on compliance with the emission limitations, work practice standards, and operation and maintenance requirements for the quench tower. The reports must include the information in Conditions V.J.5.c.1) through V.J.5.c.3) below, and as applicable, Conditions V.J.5.c.4) through



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V.J.5.c.6) below. §[63.7341(c)].

- 1) Company name and address.
- 2) Statement by a responsible official, with the official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- 3) Date of report and beginning and ending dates of the reporting period.
- 4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
- 5) If there were no deviations from the continuous compliance requirements in Conditions V.J.3.b and V.J.3.c above (for the quench tower), a statement that there were no deviations from the emission limitations, work practice standards, or operation and maintenance requirements during the reporting period.
- 6) For each deviation from an emission limitation in 40 CFR 63, Subpart CCCCC (including quench water limits) and for each deviation from the requirements for work practice standards in 40 CFR 63, Subpart CCCCC that occurs at the quench tower, the compliance report must contain the information in Conditions V.J.5.c.4) and V.J.5.c.6)a) through V.J.5.c.6)b). This includes periods of startup, shutdown, and malfunction.
 - a) The total operating time of the quench tower during the reporting period.
 - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable and the corrective action taken.

6. Work Practice Standards:

None except as provided elsewhere.

7. Additional Requirements

None except as provided elsewhere

PERMIT SHIELD IN EFFECT

K. Desulfurization Plant: P019

Process Description: Removes sulfur compounds from the coke oven gas after processing the gas in the by-products plant. The plant consists of a Vacuum Carbonate Unit, two Claus Plants, a SCOT Plant and an HCN Destruct Unit

Facility ID: P019

Max. Design Rate: 6,394,800 tons of coke per year

Capacity: 6,394,800 tons of coke per year

Raw Materials: Coke oven tail gas

Control Device: Afterburner

1. Restrictions:

- a. The SCOT Plant incinerator shall be properly maintained and operated according to good engineering and air pollution control practices at all times. [§2105.06, RACT Plan 234]
- b. The permittee shall not operate, or allow to be operated, the desulfurization plant in such manner that the opacity of visible emissions from a flue or process fugitive emissions from the desulfurization plant, excluding uncombined water: [§2104.01.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- c. The permittee shall, at all times: [Enforcement Order No. 200, November 18, 1994]
 - 1) Properly maintain two Claus Plants at the coke oven gas desulfurization facility. Each Claus Plant shall be capable of independently processing all of the coke oven gas produced by the coke plant at full production.
 - 2) Operate one Claus Plant when coke oven gas is being produced.
 - 3) Have its second Claus Plant ready for start-up and operation when a breakdown of the first Claus Plant occurs, except when the second Claus Plant is down for repairs, maintenance or modification. All repairs, maintenance and modifications to Claus Plants shall be made as expeditiously as practicable. The second Claus Plant shall start up and be fully operational within 18 hours of each breakdown on the first Claus Plant if the plant production is below 5,000 tons of coke per day at the time of the breakdown, or within 30 minutes of each such breakdown if the production is 5,000 tons of coke per day or greater.
- d. The permittee shall: [Enforcement Order No. 200, November 18, 1994]
 - 1) Operate and maintain an HCN (hydrogen cyanide) Destruct Unit at all times that coke oven gas is being produced.
 - 2) Have two catalytic reactors in the HCN Destruct Unit, each of which is capable of independently processing all of the feed gas to the HCN Destruct Unit when the coke plant is operating at full production. The second catalytic reactor shall be ready for immediate operation at all times except when the second catalytic reactor is down for repairs. All repairs to catalytic reactors shall be made as expeditiously as practicable.
- e. The permittee shall: [Enforcement Order No. 200, November 18, 1994]

- 1) Operate and maintain a Vacuum Carbonate Unit at all times that coke oven gas is being produced at the Clairton Works.
- 2) Have two absorber columns in the Vacuum Carbonate Unit, each of which is capable of independently processing all of the gas flow through the Vacuum Carbonate Unit when the coke plant is operating at full production.
- 3) Have two Axi compressors in the Vacuum Carbonate Unit, each of which is capable of independently processing all of the acid gases generated at the Vacuum Carbonate Unit when the coke plant is operating at full production.
- 4) Operate one absorber column and one Axi compressor at all times when coke oven gas is being produced.
- 5) Have its second absorber column and its second Axi compressor in the Vacuum Carbonate Unit ready at all times for operation within two hours except when the second absorber column or second Axi compressor is down for repairs, maintenance or modifications, or when there is a sudden, unexpected failure of a primary unit(s). If there is a sudden, unexpected failure of the primary absorber column or the primary Axi compressor, the secondary unit(s) shall be operational within eight hours of such failure(s). All repairs, maintenance and modifications to absorber columns and the Axi compressors shall be made as expeditiously as practicable.

f. The permittee shall: [Enforcement Order No. 200, November 18, 1994]

- 1) At all times, properly maintain two strippers in the Vacuum Carbonate Unit at the coke oven gas desulfurization facility.
- 2) Insure that each stripper shall be capable of independently processing all of the solution from the absorber column.
- 3) Operate one stripper in its Vacuum Carbonate Unit at all times when coke oven gas is being produced.
- 4) At all times, have its second stripper ready for operation within three (3) hours except when the second stripper is down for repairs, maintenance or modification. All repairs, maintenance and modifications to the strippers shall be made as expeditiously as practicable.

g. The permittee shall, at all times: [Enforcement Order No. 200, November 18, 1994]

- 1) Maintain in good working order spare heat exchangers in the Vacuum Carbonate Units at the Clairton Works coke oven gas desulfurization facility as set forth below:

Listing of Critical Heat Exchangers and Spare Heat Exchangers
For the Vacuum Carbonate Unit at the Clairton Works
Coke Oven Gas Desulfurization Facility

Unit

- a. 100 Vacuum Carbonate Units
Carbonate Reboiler
- b. Process Water Cooler
- c. Carbonate Solution Heat Exchanger

- d. 600 Vacuum Carbonate Units
 Carbonate Reboiler
 - e. Carbonate Solution Heat Exchanger
 - f. Process Water Cooler
 - g. For Both 100 and 600 Vacuum Carbonate Units
 Vacuum Pump After-cooler
- 2) Maintain in good working order spare pumps in the Vacuum Carbonate Units at the coke oven gas desulfurization facility as appropriate:

Listing of Critical Pumps and Spare Pumps
 For the Vacuum Carbonate Units at the Clairton Works
 Coke Oven Gas Desulfurization Facility

- | | <u>Unit</u> |
|----|--|
| a. | 100 Vacuum Carbonate Units
Compressor Lube Oil |
| b. | Turbine Lube Oil |
| c. | Lean Carbonate Solution |
| d. | Direct Condenser |
| e. | Rich Carbonate Solution |
| f. | 600 Vacuum Carbonate Units |
| g. | Rich Solution |
| h. | Lean Carbonate Solution |
| i. | Direct Condenser Water |
| j. | Common Spare for Rich Solution, Lean Carbonate Solution, and Direct
Condenser Water |
| k. | Lube Oil |
- h. The permittee shall not operate, or allow to be operated, any process in such manner that emissions of particulate matter from such process exceed seven (7) pounds in any 60 minute period or 100 pounds in any 24-hour period, except that no person subject to these requirements shall be required to reduce emissions to a greater degree than 99 percent. This condition shall apply to the sum of all stack emissions from such process including all emissions from any air pollution control device outlet(s) associated with such process. All fugitive emissions from such process shall be included in the sum of all stack emissions for purposes of this Subsection unless

the stack emissions can be accurately measured and all fugitive emissions do not exceed the standards established by §2104.01 of this Article or any alternative standard(s) established for such source pursuant to §2104.01 of Article XXI. [§2104.02.b]

- i. The permittee shall not operate, or allow to be operated, any process, except for miscellaneous sulfur-emitting processes for which there is an emissions standard under Part E of Article XXI, in such manner that the concentration of sulfur oxides, expressed as sulfur dioxide, in the effluent gas exceeds 500 ppm (dry basis) at any time. [§2104.03.c]
- j. The permittee shall not operate, or allow to be operated, any source in such manner that unburned coke oven gas is emitted into the open air. In addition, no person shall flare, mix, or combust coke oven gas, or allow such gas to be flared, mixed, or combusted, unless the concentration of sulfur compounds, measured as hydrogen sulfide, in such gas is less than or equal to the following concentrations: [§2105.21.h]
 - 1) For coke batteries designated 13, 14, 15, 20, and B, a concentration of ten (10) grains per hundred dry cubic feet of coke oven gas;
 - 2) The standard set forth in V.K.1.j.1) above for coke oven batteries designated 13, 14, 15, 20, and B shall be deemed satisfied for such batteries if the coke oven gas from batteries designated 1, 2, 3, 13, 14, 15, 19, 20 and B and treated by the Clairton Works coke oven gas desulfurization system in existence as of June 24, 1993, has a sulfur compound concentration, measured as H₂S, of no greater than 40 grains per hundred dry standard cubic feet of coke oven gas produced by the Clairton Works, when all sulfur emissions from its Claus Sulfur Recovery Plant and the tail gas cleaning equipment thereon, expressed as equivalent H₂S, are added to the measured H₂S. The concentration of sulfur compounds shall include tail-gas sulfur, measured as hydrogen sulfide, emitted from sulfur removal equipment.

2. Testing Requirements:

- a. At least once every two (2) years, the permittee shall perform a stack test of the SCOT plant incinerator waste gas stream to measure the emission rate of sulfur compounds. This shall be determined by the performance of three sets of two-hour average measurements of sulfur compounds in the waste gas stream and the associated volume gas flows. All concentration and flow measurements for each run shall be performed over the same two-hour sampling period. Acceptable H₂S and organic sulfide measurement techniques are specified in Chapters 15 and 16 of the Department's Source Testing Manual. Waste gas stream flow rates shall be determined by calibrated pitot tube measurements. All testing shall be performed in accordance with Article XXI. [Enforcement Order No. 200 (11/18/94) and §2108.02]
- b. The permittee shall perform emission tests on the SCOT Plant for all the criteria pollutants and benzene (PM, PM₁₀, NO_x, SO₂, CO, VOC and benzene) to develop emission factors that can be applied to quantify criteria pollutants and benzene emissions. Such testing shall be conducted in accordance with approved EPA methods in Appendix A of 40 CFR Part 60, Article XXI §2108.02, and as approved by the Department. Reports of the stack testing shall be submitted to the Department within 90 days of the date of the stack test(s). (§2103.12.h.1; §2108.02.b, §2108.02.e.)
- c. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

In order to demonstrate compliance with the concentration of sulfur compounds in the clean coke oven gas as specified in §2105.21.h, the permittee shall continuously monitor the concentration of sulfur compounds, measured as H₂S, in the desulfurized coke oven gas according to the continuous Method approved by the Department.. [§2103.12.i]

4. Record Keeping Requirements:

- a. The permittee shall maintain records of all repairs, maintenance and modifications to: [§2103.12.j]
 - a) The two Claus Plants; and
 - b) The absorber columns, strippers and axi compressors in the Vacuum Carbonate Unit.
- b. The permittee shall maintain records of the following information: [§2103.12.j]
 - 1) For each day and for the month, the average grains of H₂S per 100 dscf of coke oven gas (COG) processed by the desulfurization system:
 - a) In the raw COG delivered;
 - b) In the clean COG;
 - c) In the tail gas; and
 - d) In the total of the clean COG and the tail gas;
 - 2) The number of days on which the average grains H₂S per 100 dscf of COG (total of clean COG measurements and tail gas measurements) exceed the applicable standard, rounding off to the nearest 0.1 grain; and
 - 3) The monthly percentage availability (on-line time) of the desulfurization system, based on the total hours of coke operations and the total hours that both the plant was fully available and all COG was normally processed; and
 - 4) For each full or partial outage of the desulfurization system, including any full or partial bypassing of the system:
 - a) The starting and ending dates and times;
 - b) The total time of each outage, and the total for the month, to the nearest tenth of an hour;
 - c) The corresponding Department Breakdown Number; and the reason(s) or cause(s) for the outage.

5. Reporting Requirements:

- a. The permittee shall report any event that causes the breakdown or unavailability of: [§2103.12.k and Enforcement Order 3/28/90]
 - 1) Any Claus plant, stripper, absorber column or axi compressor to be ready for immediate operation, or to be available as spare equipment;
 - 2) Both a heat exchanger and its respective spare, as set forth in V.K.1.g.1) above or
 - 3) Both a pump and its respective spare, as set forth in V.K.1.g.2) above.
- b. No later than twenty (20) days after the end of each month, a written report of a summary of the following during each such month shall be submitted to the Department: [§2103.12.k and

Enforcement Order 3/28/90]

- 1) For each day and for the month, the average grains of H₂S per 100 dscf of coke oven gas (COG) processed by the desulfurization system:
 - a) In the raw COG delivered;
 - b) In the clean COG;
 - c) In the tail gas; and
 - d) In the total of the clean COG and the tail gas;
- 2) The number of days on which the average grains H₂S per 100 dscf of COG (total of clean COG measurements and tail gas measurements) exceed the applicable standard, rounding off to the nearest 0.1 grain; and
- 3) The monthly percentage availability (on-line time) of the desulfurization system, based on the total hours of coke operations and the total hours that both the plant was fully available and all COG was normally processed; and
- 4) For each full or partial outage of the desulfurization system, including any full or partial bypassing of the system:
 - a) The starting and ending dates and times;
 - b) The total time of each outage, and the total for the month, to the nearest tenth of an hour;
 - c) The corresponding Department Breakdown Number; and the reason(s) or cause(s) for the outage.

6. Work Practice Standards:

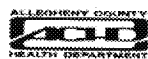
None except as provided elsewhere in this permit.

7. Additional requirements:

The permittee shall conduct an engineering evaluation of the SCOT Plant stack emissions within 8 months of permit issuance and submit a report to the Department within 30 days of completion of the evaluation. The engineering evaluation will include but not limited to the following:

- a. General review of existing equipment;
- b. General review of existing operating and maintenance procedures;
- c. Evaluation of gas combustion to ensure complete combustion; and
- d. Evaluation of the desulfurization process to determine factors affecting SCOT plant stack emissions

PERMIT SHIELD IN EFFECT



**EMISSION UNIT TERMS
AND CONDITIONS**

**U. S. Steel Clairton Works
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L. Keystone Cooling Tower (P020)

Process Description: Cooling of non-contact cooling water
Facility ID: P020
Max. Design Rate: 39,420,000,000 gallons of water cooled per year
Capacity: 39,420,000,000 gallons of water cooled per year
Raw Materials: Non-contact cooling water
Control Device: Mist eliminators

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the Keystone cooling tower unless there is a mist eliminator installed, maintained and operated consistently with good air pollution control practice. [§2104.02.h]
- b. The permittee shall only cool non-contact water in the cooling tower. [§2103.12.a.]
- c. The permittee shall not operate, or allow to be operated, the Keystone cooling tower unless the water used for such cooling is equivalent to, or better than, the water quality standards established for the Monongahela River by regulations promulgated by the DEP under the Pennsylvania Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. 691.1 et seq., except that water from the Monongahela River may be used for such cooling. [§2104.02.h]

2. Testing Requirements:

None, except as provided elsewhere in this permit.

3. Monitoring Requirements (§2102.04.e):

None, except as provided elsewhere in this permit.

4. Record Keeping Requirements:

None, except as provided elsewhere in this permit.

5. Reporting Requirements:

None, except as provided elsewhere in this permit.

6. Work Practice Standards

None except as provided elsewhere.

7. Additional requirements

None except as provided elsewhere.

PERMIT SHIELD IN EFFECT

M. Process P021: Coke By-Product Recovery Plant

Process Description: Recovery of tars, ammonia, light-oil and clean coke oven gas from raw coke oven gas.
Facility ID: P021
Max. Design Rate: 8,240,605 tons of coal charged per year
Capacity: 6,394,800 tons of coke per year
Raw Materials: Raw coke oven gas
Control Device: Coke oven gas blanketing system and blanketing gas is fired in boilers and other furnaces to destroy VOCs captured by the blanketing system.

As identified above, Process P021 consists of the following number and type of equipment: main axial compressors, main regenerators, main vacuum machines, light oil vacuum machines, 8-light oil condensers, 3-cooler separators, light oil regenerators, 3-light oil tanks, final cooler demister wash, super-still light oil decanter, light oil blow down tank, 2-light oil decanters (V-604 & 605), 6-light oil storage tanks (T59 – T64), 9-tar storage tanks (3TA 41-49), 22-tar Decanters (3TA 12-23, 25-28, & 30-35), 3-wastewater surge tanks, 2-wastewater settling tanks, wastewater ammonia still feed tank, methanol storage tank-V-400 (50,000 gallons), foul methanol storage tank-V-410 (50,000 gallons) and methanol/MEA storage tank-V430 (20,000 gallons).

1. Restrictions:

- a. At no time shall the permittee operate the by-products plant unless the clean coke oven gas blanketing system is being properly maintained and operated at all times while the plant process units blanketed by the system are emitting VOCs, with the exception of emergency or planned outages, repairs or maintenance. [§2105.06; RACT Plan 234]
- b. All VOC emissions processed by the blanketing system shall be incinerated by combustion in the facilities coke batteries or boilers or by downstream consumers. [§2105.06; RACT Plan 234]
- c. The permittee shall enclose and seal all openings on each process vessel, tar storage tank, and tar-intercepting sump. [§61.132(a)(1)]
- d. The permittee shall duct gases from each process vessel, tar storage tank and tar-intercepting sump to the gas collection system, gas distribution system, or other enclosed point in the by-product recovery process where benzene in the gas will be recovered or destroyed. This control system shall be designed and operated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined by the methods specified in Reference Method 21 of Appendix A, 40 CFR Part 60. This system can be designed as a closed, positive pressure, gas blanketing system. [§61.132(a)(2)]
 - 1) Except, the permittee may elect to install, operate, and maintain a pressure relief device, vacuum relief device, an access hatch, and a sampling port on each process vessel, tar storage tank and tar-intercepting sump. Each access hatch and sampling port must be equipped with a gasket and a cover, seal or lid that must be kept in a closed position at all times, unless in actual use.
 - 2) The permittee may elect to leave open to the atmosphere the portion of the liquid surface in each tar decanter necessary to permit operation of a sludge conveyor. If the permittee elects to maintain an opening on part of the liquid surface of the tar decanter, the permittee shall install, operate, and maintain a water leg seal on the tar decanter roof near the sludge discharge chute to ensure enclosure of the major portion of liquid surface not necessary for

the operation of the sludge conveyor.

- e. The permittee shall comply with the requirements of V.M.1.c and V.M.1.d above, and V.M.3.a and V.M.3.b below for each benzene storage tank, BTX storage tank, light-oil storage tank, and excess ammonia-liquor storage tank. [§61.132(d)]
- f. The permittee shall enclose and seal the liquid surface in the light oil sump to form a closed system to contain the emissions. [§ 61.133(a)]
 - 1) Except, the permittee may elect to install, operate, and maintain a vent on the light-oil sump cover. Each vent pipe must be equipped with a water leg seal, a pressure relief device, or vacuum relief device.
 - 2) Except, the permittee may elect to install, operate, and maintain an access hatch on each light-oil sump cover. Each access hatch must be equipped with a gasket and a cover, seal, or lid that must be kept in a closed position at all times, unless in actual use.
 - 3) The light-oil sump cover may be removed for periodic maintenance but must be replaced (with seal) at completion of the maintenance operation.
- g. The venting of steam or other gases from the by-product process to the light-oil sump is not permitted. [§ 61.133(b)]
- h. The permittee shall allow no ("zero") emissions from naphthalene processing, final coolers and final-cooler cooling tower. [§61.134(a)]
- i. The permittee of equipment in benzene service shall comply with the requirements of 40 CFR Part 61, Subpart V, except as provided in V.M.1.j and V.M.3.d below Also, the provisions of §61.242-3 and §61.242-9 of 40 CFR Subpart V do not apply to 40 CFR 61, Subpart L. [§61.135(a) & (b)]
- j. Each piece of equipment in benzene service to which 40 CFR 61, Subpart L applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment in benzene service. [§61.135(c)]
- k. The permittee subject to the provisions of 40 CFR 61, Subpart L, shall demonstrate compliance with the requirements of V.M.1.c through V.M.1.j above and V.M.3.a through V.M.3.h below, except as provided under Conditions V.M.1.nn through V.M.1.uu below. [§61.136(a)]
- l. Compliance with 40 CFR 61, Subpart L shall be determined by a review of records, review of performance test results, inspections, or any combination thereof, using the methods and procedures specified in V.M.2.a below. [§61.136(b)]
- m. The permittee may request permission to use an alternative means of emission limitation to meet the requirements in Conditions V.M.1.c through V.M.1.g above, V.M.1.i and V.M.1.j above, and V.M.3.a through V.M.3.h below, V.M.1.l through V.M.1.t below, V.M.3.r through V.M.3.z below, V.M.3.ii through V.M.3.tt below and V.M.1.mm below. [§61.136(d)]
 - 1) Permission to use an alternative means of emission limitation shall be requested as specified in §61.12(d).
 - 2) When the Administrator and the Department evaluates requests for permission to use alternative means of emission limitation for sources subject to Conditions V.M.1.c through V.M.1.g above and V.M.3.a through V.M.3.c below (except tar decanters) the Administrator and the Department shall compare test data for the means of emission limitation to a benzene

- control efficiency of 98 percent. For tar decanters, the Administrator and the Department shall compare test data for the means of emission limitation to a benzene control efficiency of 95 percent.
- 3) For any requests for permission to use an alternative to the work practices required under Conditions V.M.1.i and V.M.1.j above, and V.M.3.d through V.M.3.h below, the provisions of Condition V.M.1.xx below shall apply.
- n. The permittee subject to the provisions of 40 CFR Part 61, Subpart V shall demonstrate compliance with the requirements of V.M.1.n through V.M.1.mm below, and V.M.3.i through V.M.3.tt below as required in 40 CFR 61.05, except as provided in Conditions V.M.1.nn through V.M.1.rr below and Conditions V.M.1.vv through V.M.1.zz below. [§61.242-1(a)]
 - o. Compliance with this 40 CFR 61, Subpart V shall be determined by review of records, review of performance test results, and inspection using the methods and procedures specified in V.M.3.uu through V.M.3.yy below. [§61.242-1(b)]
 - p. The permittee may request a determination of alternative means of emission limitation to the requirements of §61.242-2; 61.242-3; 61.242-5; 61.242-6; 61.242-7; 61.242-8 and 61.242-11 as provided in §61.244. [§61.242-1(c)(1)]
 - q. If the Administrator and Department make a determination that a means of emission limitation is at least a permissible alternative to the requirements of §61.242-2; 61.242-3; 61.242-5; 61.242-6; 61.242-7; 61.242-8 or 61.242-11, an owner or operator shall comply with the requirements of that determination. [§61.242-1(c)(2)]
 - r. Each piece of equipment to which 40 CFR 61, Subpart V applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment. [§61.242-1(d)]
 - s. Equipment that is in vacuum service is excluded from the requirements of V.M.1.t through V.M.1.mm below and V.M.3.i through V.M.1.rr below if it is identified as required in V.M.4.g.5) below. [§61.242-1(e)]
 - t. Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to atmosphere, except as provided in §61.242-1(c) and Conditions V.M.1.bb and V.M.1.cc below. [§61.242-3(a)]
 - u. Each compressor seal system as required in Condition V.M.1.t above shall be: [§61.242-3(b)]
 - 1) Operated with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or
 - 2) Equipped with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of Conditions V.M.3.ii through V.M.3.tt below and V.M.1.mm below; or
 - 3) Equipped with a system that purges the barrier fluid into a process stream with zero VHAP emissions to atmosphere.
 - v. The barrier fluid shall not be in VHAP service and, if the compressor is covered by standards under 40 CFR part 60, shall not be in VOC service. [§61.242-3(c)]
 - w. Each barrier fluid system as described in Conditions V.M.1.t through V.M.1.v above shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both.

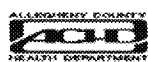
[§61.242-3(d)]

- x. Each sensor as required in Condition V.M.1.w above shall be checked daily or shall be equipped with an audible alarm unless the compressor is located within the boundary of an unmanned plant site. [§61.242-3(e)(1)]
- y. The permittee shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. [§61.242-3(e)(2)]
- z. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined under Condition V.M.1.y above, a leak is detected. [§61.242-3(f)]
- aa. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Conditions V.M.3.dd through V.M.3.hh below. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [§61.242-3(g)]
- bb. A compressor is exempt from the requirements of Conditions V.M.1.t and V.M.1.u above if it is equipped with a closed-vent system to capture and transport leakage from the compressor drive shaft back to a process or fuel gas system or to a control device that complies with the requirements of V.M.3.ii through V.M.3.tt below and V.M.1.mm below, except as provided in Condition V.M.1.cc below. [§61.242-3(h)]
- cc. Any Compressor that is designated, as described in Condition V.M.4.g.2) below, for no detectable emission as indicated by an instrument reading of less than 500 ppm above background is exempt from the requirements of paragraphs V.M.1.t through V.M.1.bb above if the compressor: [§61.242-3(i)]
 - 1) Is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in V.M.3.vv below; and
 - 2) Is tested for compliance with paragraph V.M.1.cc.1) above initially upon designation, annually, and at other times requested by the Administrator and the Department.
- dd. Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in §61.245(c) or V.M.3.vv. [§61.242-4(a)]
- ee. The permittee shall equip each sampling connection system with a closed-purge, closed loop, or closed vent system, except as provided in V.M.1.p and V.M.1.q. Gases displaced during filling of the sample container are not required to be collected or captured. [§61.242-5(a)]
- ff. Each closed-purge, closed loop or closed vent system as required in Condition V.M.1.ee above shall: [§61.242-5(b)]
 - 1) Return the purged process fluid directly to the process line; or
 - 2) Collect and recycle the purged process fluid; or
 - 3) Be designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of Conditions V.M.3.ii through V.M.3.tt below and V.M.1.mm below, or
 - 4) Collect, store, and transport the purged process fluid to any of the following systems or

facilities:

- a) A waste management unit as defined in §63.111 if the waste management unit is subject to and operated in compliance with the provisions of 40 CFR Part 63, Subpart G, applicable to Group 1 wastewater streams; or
- b) A treatment, storage, or disposal facility subject to regulation under 40 CFR Part 262, 264, 265, or 266; or
- c) A facility permitted, licensed, or registered by a State to manage municipal or industrial solid waste, if the process fluids are not hazardous waste as defined in 40 CFR Part 261.

- gg. In-situ sampling systems and sampling systems without purges are exempt from the requirements of Conditions V.M.1.ee and V.M.1.ff above. [§61.242-5(c)]
- hh. The permittee shall equip each open-ended valve or line with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 61.242-1(c). The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. [§61.242-6(a)]
- ii. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. [§61.242-6(b)]
- jj. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with Condition V.M.1.hh above at all other times. [§61.242-6(c)]
- kk. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of Conditions V.M.1.hh through V.M.1.jj above. [§61.242-6(d)]
- ll. Open-ended valves or lines containing materials which would auto-catalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in Conditions V.M.1.hh through V.M.1.jj above are exempt from the requirements of Conditions V.M.1.hh through V.M.1.jj above. [§61.242-6(e)]
- mm. Closed vent systems and control devices used to comply with provisions of 40 CFR Part 61, Subpart V shall be operated at all times when emissions may be vented to them. [§61.242-11(m)]
- nn. The permittee may elect to have all valves within a process unit to comply with an allowable percentage of valves leaking of equal to or less than 2.0 percent. [§61.243-1(a)]
- oo. The following requirements shall be met if the permittee decides to comply with an allowable percentage of valves leaking: [§61.243-1(b)]
- 1) The permittee must notify the Administrator and the Department that the permittee has elected to have all valves within a process unit to comply with the allowable percentage of valves leaking before implementing this alternative standard, as specified in Condition V.M.5.d below.
 - 2) A performance test as specified in Condition V.M.1.pp below shall be conducted initially upon designation, annually, and at other times requested by the Administrator and the Department.



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- 3) If a valve leak is detected, it shall be repaired in accordance with Condition V.M.5.d below.
- pp. Performance tests shall be conducted in the following manner: [§61.243-1(e)]
- 1) All valves in VHAP service within the process unit shall be monitored within 1 week by the methods specified in Condition V.M.3.uu below.
 - 2) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
 - 3) The leak percentage shall be determined by dividing the number of valves in VHAP service for which leaks are detected by the number of valves in VHAP service within the process unit.
- qq. The permittee who elects to have all valves comply with this alternative standard shall not have a process unit with a leak percentage greater than 2.0 percent. [§61.243-1(d)]
- rr. If the permittee decides no longer to comply with Conditions V.M.1.nn through V.M.1.qq above, the permittee must notify the Administrator and the Department in writing that the work practice standard described in Conditions V.M.3.r through V.M.3.v below will be followed. [§61.243-1(e)]
- ss. The permittee may elect for all valves within a process unit to comply with one of the alternative work practices specified in Conditions V.M.1.oo.2) and V.M.1.oo.3) above. [§61.243-2(a)(1)]
- tt. The permittee shall notify the Administrator and the Department before implementing one of the alternative work practices, as specified in Condition V.M.3.u below. [§61.243-2(a)(2)]
- uu. The permittee shall: [§61.243-2(b)]
- 1) Comply initially with the requirements for valves, as described in Conditions V.M.3.r through V.M.3.y below.
 - 2) After 2 consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, an owner or operator may begin to skip one of the quarterly leak detection periods for the valves in VHAP service.
 - 3) After five consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, an owner or operator may begin to skip three of the quarterly leak detection periods for the valves in VHAP service.
 - 4) If the percentage of valves leaking is greater than 2.0, the owner or operator shall comply with the requirements as described in Conditions V.M.3.r through V.M.3.y below but may again elect to use this section.
- vv. Permission to use an alternative means of emission limitation under section 112(e)(3) of the Clean Air Act shall be governed by the procedures in Conditions V.M.1.ww through V.M.1.zz below: [§61.244(a)]
- ww. Where the standard is an equipment, design, or operational requirement: [§61.244(b)]
- 1) The permittee applying for permission shall be responsible for collecting and verifying test data for an alternative means of emission limitation to test data for the equipment, design, and operational requirements.
 - 2) The Administrator and the Department may condition the permission on requirements that may be necessary to assure operation and maintenance to achieve the same emission reduction as the equipment, design, and operational requirements.

- xx. Where the standard is a work practice: [§61.244(c)]
- 1) Each owner or operator applying for permission shall be responsible for collecting and verifying test data for an alternative means of emission limitation.
 - 2) For each source for which permission is requested, the emission reduction achieved by the required work practices shall be demonstrated for a minimum period of 12 months.
 - 3) For each source for which permission is requested, the emission reduction achieved by the alternative means of emission limitation shall be demonstrated.
 - 4) Each owner or operator applying for permission shall commit in writing each source to work practices that provide for emission reductions equal to or greater than the emission reductions achieved by the required work practices.
 - 5) The Administrator and the Department will compare the demonstrated emission reduction for the alternative means of emission limitation to the demonstrated emission reduction for the required work practices and will consider the commitment in conditions V.M.1.xx.4) above.
 - 6) The Administrator and the Department may condition the permission on requirements that may be necessary to assure operation and maintenance to achieve the same emission reduction as the required work practices of 40 CFR 61, Subpart V.
- yy. An owner or operator may offer a unique approach to demonstrate the alternative means of emission limitation. [§61.244(d)]
- zz. Manufacturers of equipment used to control equipment leaks of a VHAP may apply to the Administrator and the Department for permission for an alternative means of emission limitation that achieves a reduction in emissions of the VHAP achieved by the equipment, design, and operational requirements of 40 CFR 61, Subpart V. The Administrator and Department will grant permission according to the provisions of conditions V.M.1.wv through V.M.1.yy above. [§61.244(e)]
- aaa. If the total annual benzene quantity from facility waste is less than 10 megagrams per year (Mg/yr) (11 ton/yr) the permittee shall be exempt from the requirements of paragraphs §61.342(b) and (c). The total annual benzene quantity from facility waste is the sum of the annual benzene quantity for each waste stream at the facility that has a flow-weighted annual average water content greater than 10 percent or that is mixed with water, or other wastes, at any time and the mixture has an annual average water content greater than 10 percent. The benzene quantity in a waste stream is to be counted only once without multiple counting if other waste streams are mixed with or generated from the original waste stream. Other specific requirements for calculating the total annual benzene waste quantity are as follows: [61.342(a)]
- 1) Wastes that are exempted from control under §§ 61.342(c)(2) and 61.342(c)(3) are included in the calculation of the total annual benzene quantity if they have an annual average water content greater than 10 percent, or if they are mixed with water or other wastes at any time and the mixture has an annual average water content greater than 10 percent.
 - 2) The benzene in a material subject to 40 CFR 61, Subpart FF that is sold is included in the calculation of the total annual benzene quantity if the material has an annual average water content greater than 10 percent.
 - 3) Benzene in wastes generated by remediation activities conducted at the facility, such as the excavation of contaminated soil, pumping and treatments of groundwater, and the recovery of product from soil or groundwater, are not included in the calculation of total annual benzene quantity for that facility. If the facility's total annual benzene quantity is 10 Mg/yr (11 ton/yr)

or more, wastes generated by remediation activities are subject to the requirements of §61.342(c) through 61.342(h). If the facility is managing remediation waste generated offsite, the benzene in this waste shall be included in the calculation of total annual benzene quantity in facility waste, if the waste streams have an annual average water content greater than 10 percent, or if they are mixed with water or other wastes at any time and the mixture has an annual average water content greater than 10 percent. The total annual benzene quantity is determined based upon the quantity of benzene in the waste before any waste treatment occurs to remove the benzene except as specified in Conditions V.M.2.d.1)a)i) through V.M.2.d.1)a)iii) below.

- bbb. No person shall place or store, or allow to be placed or stored, a volatile organic compound having a vapor pressure greater than 1.5 psia under actual storage conditions in any stationary tank, reservoir, or other container with a capacity greater than 40,000 gallons, unless such tank, reservoir, or other container is a pressure tank capable of maintaining working pressure sufficient to at all times prevent vapor or gas loss to the atmosphere or is equipped with: [§2105.12.b]
 - 1) An external or internal floating roof, except that this control equipment shall not be permitted if the volatile organic compounds have a vapor pressure of 11.0 psia or greater under actual storage conditions; or
 - 2) A vapor recovery and disposal system reducing uncontrolled emissions of volatile organic compounds by at least 90% by weight. Compliance testing shall be done in accordance with the provisions of §2107.04 of this Article.
- ccc. The permittee shall not operate or allow to be operated methanol storage tanks V-400 and V-410 unless gas blanketing system reducing emissions of VOC by at least 98% by weight is in place and operating. [ACHD Installation Permit 0052-I004a and §2102.04.b.6]
- ddd. The throughput for each methanol storage tank V-400 and V-410 shall not exceed 867,000 gallons per year, for the tank V-430 (MEA/methanol tank) throughput shall not exceed 160,000 gallons per year. [ACHD Installation Permit 0052-I004a and §2102.04.b.6]
- eee. Per General Condition III.17 above, the permittee shall not reactivate any tank that has been out of operation for a period of one year or more unless the permittee has submitted a reactivation plan request to, and received a written reactivation plan approval from the Department. [§2103.13(d)]
 - 1) The reactivation of a tank that has been deactivated for more than ten (10) years shall constitute a new source under Article XXI requiring the issuance of a new source Installation Permit. [§2103.13(d)(5)]
 - 2) All tanks deactivated for more than one (1) year shall constitute new sources upon reactivation unless the permittee, by no later than one (1) year following actual deactivation, submits a maintenance plan for the tank to be implemented during the period of deactivation. [§2103.13(d)(7)]
 - 3) Any reactivation plan issued for a tank which has been deactivated for more than five (5) years shall require the implementation of BACT prior to actual reactivation. [§2103.13(d)(8)]

- fff. **Emissions Limitations:** Emissions from sources in the by-products recovery area and regulated by the benzene NESHAPS (40 CFR Part 61 Subpart L) shall not exceed the limits listed in Table V-M-1 at any time: [§2105.03; Installation Permit 91-I-0021 P)]

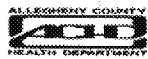
TABLE V-M-1 – By-Products Area Emission Limitations

POLLUTANT	ANNUAL EMISSION LIMIT (tons/year) ¹
VOC	68.0
Benzene	54.0

¹ A year is defined as any consecutive 12-month period.

2. Testing Requirements:

- a. To determine whether or not a piece of equipment is in benzene service, the methods in V.M.3.ww through V.M.3.yy below shall be used, except that, for exhausters, the percent benzene shall be 1 percent by weight, rather than the 10 percent by weight described in Conditions V.M.3.ww through V.M.3.yy below. [§61.137(b)]
- b. The permittee shall determine the total annual benzene quantity from facility waste by the following procedure: [§61.355(a)]
 - 1) For each waste stream subject to this 40 CFR 61, Subpart FF having a flow-weighted annual average water content greater than 10 percent water, on a volume basis as total water, or is mixed with water or other wastes at any time and the resulting mixture has an annual average water content greater than 10 percent as specified in Condition V.M.1.aaa above, the permittee shall:
 - a) Determine the annual waste quantity for each waste stream using the procedures specified in paragraph V.M.2.c).
 - b) Determine the flow-weighted annual average benzene concentration for each waste stream using the procedures specified in paragraph V.M.2.c).
 - c) Calculate the annual benzene quantity for each waste stream by multiplying the annual waste quantity of the waste stream times the flow-weighted annual average benzene concentration.
 - 2) Total annual benzene quantity from facility waste is calculated by adding together the annual benzene quantity for each waste stream generated during the year and the annual benzene quantity for each process unit turnaround waste annualized according to Condition V.M.2.b.4) below.
 - 3) If the total annual benzene quantity from facility waste is equal to or greater than 10 Mg/yr (11 ton/yr), then the permittee shall comply with the requirements of §61.342 (c), (d), or (e).
 - 4) If the total annual benzene quantity from facility waste is less than 10 Mg/yr (11 ton/yr) but is equal to or greater than 1 Mg/yr (1.1 ton/yr), then the permittee shall:
 - a) Comply with the recordkeeping requirements of V.M.4.o below and reporting requirements of V.M.5.e below; and
 - b) Repeat the determination of total annual benzene quantity from facility waste at least



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once per year and whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 10 Mg/yr (11 ton/yr) or more.

- 5) If the total annual benzene quantity from facility waste is less than 1 Mg/yr (1.1 ton/yr), then the permittee shall:
 - a) Comply with the recordkeeping requirements of V.M.4.o below and reporting requirements of V.M.5.e below; and
 - b) Repeat the determination of total annual benzene quantity from facility waste whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more.
 - 6) The benzene quantity in a waste stream that is generated less than one time per year, except as provided for process unit turnaround waste in condition V.M.2.c.4) below, shall be included in the determination of total annual benzene quantity from facility waste for the year in which the waste is generated unless the waste stream is otherwise excluded from the determination of total annual benzene quantity from facility waste in accordance with conditions V.M.2.b through V.M.2.d. The benzene quantity in this waste stream shall not be annualized or averaged over the time interval between the activities that resulted in generation of the waste, for purposes of determining the total annual benzene quantity from facility waste.
- c. The permittee shall determine the annual waste quantity at the point of waste generation, unless otherwise provided in Conditions V.M.2.c.(1) through (4) by one of the methods given in Conditions V.M.2.c.5) through 7) below [§61.355(b)]
- 1) The determination of annual waste quantity for sour water streams that are processed in sour water strippers shall be made at the point that the water exits the sour water stripper.
 - 2) The determination of annual waste quantity for wastes at coke by-product plants subject to and complying with the control requirements of §61.132, §61.133, §61.134, or §61.139 of 40 CFR subpart L shall be made at the location that the waste stream exits the process unit component or waste management unit controlled by that subpart or at the exit of the ammonia still, provided that the following conditions are met:
 - i. The transfer of wastes between units complying with the control requirements of 40 CFR Part 61, Subpart L, process units, and the ammonia still is made through hard piping or other enclosed system.
 - ii. The ammonia still meets the definition of a sour water stripper in §61.341.
 - 3) The determination of annual waste quantity for wastes that are received at hazardous waste treatment, storage, or disposal facilities from offsite shall be made at the point where the waste enters the hazardous waste treatment, storage, or disposal facility.
 - 4) The determination of annual waste quantity for each process unit turnaround waste generated only at 2 year or greater intervals, may be made by dividing the total quantity of waste generated during the most recent process unit turnaround by the time period (in the nearest tenth of a year) between the turnaround resulting in generation of the waste and the most recent preceding process turnaround for the unit. The resulting annual waste quantity shall be

included in the calculation of the annual benzene quantity as provided in V.M.2.b.1)c) above for the year in which the turnaround occurs and for each subsequent year until the unit undergoes the next process turnaround. For estimates of total annual benzene quantity as specified in the 90-day report, required under §61.357(a)(1), the owner or operator shall estimate the waste quantity generated during the most recent turnaround, and the time period between turnarounds in accordance with good engineering practices. If the owner or operator chooses not to annualize process unit turnaround waste, as specified in this paragraph, then the process unit turnaround waste quantity shall be included in the calculation of the annual benzene quantity for the year in which the turnaround occurs.

- 5) Select the highest annual quantity of waste managed from historical records representing the most recent 5 years of operation or, if the facility has been in service for less than 5 years but at least 1 year, from historical records representing the total operating life of the facility;
 - 6) Use the maximum design capacity of the waste management unit; or
 - 7) Use measurements that are representative of maximum waste generation rates.
- d. For the purposes of the calculation required by paragraph V.M.2.b above, the permittee shall determine the flow-weighted annual average benzene concentration in a manner that meets the requirements given in paragraph V.M.2.d.1) below using either of the methods given in paragraphs V.M.2.e or V.M.2.f below. [§61.355(c)]
- 1) The determination of flow-weighted annual average benzene concentration shall meet all of the following criteria:
 - a) The determination shall be made at:
 - i) The location that the waste stream exits the process unit component or waste management unit controlled by 40 CFR Part 61, Subpart L or at the exit of the ammonia still, provided that the following conditions are met:
 - (1) The transfer of wastes between units complying with the control requirements of 40 CFR Part 61, Subpart L, process units, and the ammonia still is made through hard piping or other enclosed system.
 - (2) The ammonia still meets the definition of a sour water stripper in §61.341.
 - ii) The determination for wastes that are received from offsite shall be made at the point where the waste enters the hazardous waste treatment, storage, or disposal facility.
 - iii) The determination of flow-weighted annual average benzene concentration for process unit turnaround waste shall be made using either of the methods given in paragraphs V.M.2.e or V.M.2.f below. The resulting flow-weighted annual average benzene concentration shall be included in the calculation of annual benzene quantity as provided in paragraph V.M.2.b.1)c) above for the year in which the turnaround occurs and for each subsequent year until the unit undergoes the next process unit turnaround.
 - b) Volatilization of the benzene by exposure to air shall not be used in the determination to reduce the benzene concentration.
 - c) Mixing or diluting the waste stream with other wastes or other materials shall not be used in the determination -- to reduce the benzene concentration.
 - d) The determination shall be made prior to any treatment of the waste that removes benzene, except as specified in paragraphs V.M.2.b.1)a) above.
 - e) For wastes with multiple phases, the determination shall provide the weighted-average benzene concentration based on the benzene concentration in each phase of the waste and

the relative proportion of the phases.

- e. The permittee shall provide sufficient information to document the flow-weighted annual average benzene concentration of each waste stream. Examples of information that could constitute knowledge include material balances, records of chemical purchases, or previous test results provided the results are still relevant to the current waste stream conditions. If test data are used, then the permittee shall provide documentation describing the testing protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the flow-weighted annual average benzene concentration for the waste stream. When the permittee and the Administrator and the Department do not agree on determinations of the flow-weighted annual average benzene concentration based on knowledge of the waste, the procedures in paragraph V.M.2.f below shall be used to resolve the disagreement. [§61.355(c)(2)]
- f. Measurements of the benzene concentration in the waste stream in accordance with the following procedures: [§61.355(c)(3)]
 - 1) Collect a minimum of three representative samples from each waste stream. Where feasible, samples shall be taken from an enclosed pipe prior to the waste being exposed to the atmosphere.
 - 2) For waste in enclosed pipes, the following procedures shall be used:
 - a) Samples shall be collected prior to the waste being exposed to the atmosphere in order to minimize the loss of benzene prior to sampling.
 - b) A static mixer shall be installed in the process line or in a by-pass line unless the owner or operator demonstrates that installation of a static mixer in the line is not necessary to accurately determine the benzene concentration of the waste stream.
 - c) The sampling tap shall be located within two pipe diameters of the static mixer outlet.
 - d) Prior to the initiation of sampling, sample lines and cooling coil shall be purged with at least four volumes of waste.
 - e) After purging, the sample flow shall be directed to a sample container and the tip of the sampling tube shall be kept below the surface of the waste during sampling to minimize contact with the atmosphere.
 - f) Samples shall be collected at a flow rate such that the cooling coil is able to maintain a waste temperature less than 10 °C (50 °F).
 - g) After filling, the sample container shall be capped immediately (within 5 seconds) to leave a minimum headspace in the container.
 - h) The sample containers shall immediately be cooled and maintained at a temperature below 10 °C (50 °F) for transfer to the laboratory.
 - 3) When sampling from an enclosed pipe is not feasible, a minimum of three representative samples shall be collected in a manner to minimize exposure of the sample to the atmosphere and loss of benzene prior to sampling.
 - 4) Each waste sample shall be analyzed using one of the following test methods for determining the benzene concentration in a waste stream:
 - a) Method 8020, Aromatic Volatile Organics, in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in §61.18 of 40 CFR 61);
 - b) Method 8021, Volatile Organic Compounds in Water by Purge and Trap Capillary Column Gas Chromatography with Photo-ionization and Electrolytic Conductivity Detectors in Series in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in §61.18 of 40 CFR 61);

- c) Method 8240, Gas Chromatography/Mass Spectrometry for Volatile Organics in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in § 61.18 of 40 CFR 61);
 - d) Method 8260, Gas Chromatography/Mass Spectrometry for Volatile Organics: Capillary Column Technique in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846 (incorporation by reference as specified in § 61.18 of 40 CFR 61);
 - e) Method 602, Purgeable Aromatics, as described in 40 CFR part 136, appendix A, Test Procedures for Analysis of Organic Pollutants, for wastewaters for which this is an approved EPA methods; or
 - f) Method 624, Purgeables, as described in 40 CFR Part 136, appendix A, Test Procedures for Analysis of Organic Pollutants, for wastewaters for which this is an approved EPA method.
- 5) The flow-weighted annual average benzene concentration shall be calculated by averaging the results of the sample analyses as follows:

$$\bar{C} = \frac{1}{Q_t} \times \sum_{i=1}^n (Q_i)(C_i)$$

Where:

C = Flow-weighted annual average benzene concentration for waste stream, ppmw.

Q_t = Total annual waste quantity for waste stream, kg/yr (lb/yr).

n = Number of waste samples (at least 3).

Q_i = Annual waste quantity for waste stream represented by C_i, kg/yr (lb/yr).

C_i = Measured concentration of benzene in waste sample i, ppmw.

3. Monitoring Requirements:

- a. Following the installation of any control equipment used to meet the requirements of V.M.1.c and V.M.1.d above, the permittee shall monitor the connections and seals on each control system to determine if it is operating with no detectable emissions, using Reference Method 21 of 40 CFR Part 60, Appendix A and procedures specified in §61.245(c), and shall visually inspect each source (including sealing materials) and the ductwork of the control system for evidence of visible defects such as gaps or tears. This monitoring and inspection shall be conducted on a semiannual basis and at any other time after the control system is re-pressurized with blanketing gas following removal of the cover or opening of the access hatch. [§61.132(b)]
 - 1) If an instrument reading indicates an organic chemical concentration more than 500 ppm above a background concentration, as measured by Method 21, a leak is detected.
 - 2) If visible defects such as gaps in sealing materials are observed during a visual inspection, a leak is detected
 - 3) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected
 - 4) A first attempt at repair of any leak or visible defect shall be made no later than 5 calendar days after each leak is detected.

- b. Following the installation of any control system used to meet the requirements of Conditions V.M.1.c and V.M.1.d above, the permittee shall conduct a maintenance inspection of the control system on an annual basis for evidence of system abnormalities, such as blocked or plugged lines, sticking valves, plugged condensate traps, and other maintenance defects that could result in abnormal system operation. The permittee shall make a first attempt at repair within 5 days, with repair within 15 days of detection. [§61.132(c)]
- c. Following the installation of any control equipment used to meet the requirements of Condition V.M.1.f above, the permittee shall monitor the connections and seals on each control system to determine if it is operating with no detectable emissions, using Method 21 (40 CFR part 60, appendix A) and the procedures specified in V.M.3.vv below, and shall visually inspect each source (including sealing materials) for evidence of visible defects such as gaps or tears. This monitoring and inspection shall be conducted semiannually and at any other time the cover is removed. [§61.133(c)]
 - 1) If an instrument reading indicates an organic chemical concentration more than 500 ppm above a background concentration, as measured by Method 21, a leak is detected.
 - 2) If visible defects such as gaps in sealing materials are observed during a visual inspection, a leak is detected.
 - 3) When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected.
 - 4) A first attempt at repair of any leak or visible defect shall be made no later than 5 calendar days after each leak is detected.
- d. Each exhauster shall be monitored quarterly to detect leaks by the methods specified in V.M.3.uu below except as provided in §61.136(d) and paragraphs V.M.3.e through V.M.3.g below. [§61.135(d)]
 - 1) If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.
 - 2) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after it is detected, except as provided in V.M.3.aa and V.M.3.bb below. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- e. Each exhauster equipped with a seal system that includes a barrier fluid system and that prevents leakage of process fluids to the atmosphere is exempt from the requirements of Condition V.M.3.d above provided the following requirements are met: [§61.135(e)]
 - 1) Each exhauster seal system is:
 - a) Operated with the barrier fluid at a pressure that is greater than the exhauster stuffing box pressure; or
 - b) Equipped with a barrier fluid system that is connected by a closed vent system to a control device that complies with the requirements of Conditions V.M.3.ii through V.M.3.tt below and V.M.1.mm above; or
 - c) Equipped with a system that purges the barrier fluid into a process stream with zero benzene emissions to the atmosphere.
 - 2) The barrier fluid is not in benzene service.
 - 3) Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both.
 - 4) Each sensor as described in Condition V.M.3.e.3) above:

- a) Shall be checked daily or shall be equipped with an audible alarm.
 - b) The permittee shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both.
- 5) If the sensor indicates failure of the seal system, the barrier system, or both (based on the criterion determined under Condition V.M.3.e.4)b) above, a leak is detected.
- 6) When a leak is detected:
 - a) It shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Conditions V.M.3.dd through V.M.3.hh below.
 - b) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- f. An exhauster is exempt from the requirements of Condition V.M.3.d above if it is equipped with a closed vent system capable of capturing and transporting any leakage from the seal or seals to a control device that complies with the requirements of Conditions V.M.3.ii through V.M.3.tt below and V.M.1.mm above except as provided in Condition V.M.3.g.1) below. [§61.135(f)]
- g. Any exhauster that is designated, as described in V.M.4.g below for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of Condition V.M.3.d above if the exhauster: [§61.135(g)]
 - 1) Is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the methods specified in §61.245(e); and
 - 2) Is tested for compliance with Condition V.M.3.g.1) above initially upon designation, annually, and at other times requested by the Administrator and the Department.
- h. Any exhauster that is in vacuum service is excluded from the requirements of this 40 CFR 61, Subpart L if it is identified as required in Condition V.M.4.g.5) below. [§61.135(h)]
- i. Each pump shall be: [§61.242-2(a)]
 - 1) Monitored monthly to detect leaks by the methods specified in Condition V.M.3.uu below, except as provided §61.242-1(c) and V.M.1.r and V.M.1.s above.
 - 2) Checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
- j. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. If there are indications of liquids dripping from the pump seal, a leak is detected. [§61.242-2(b)]
- k. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Conditions V.M.3.dd through V.M.3.hh below. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [§61.242-2(c)]
- l. Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements in Conditions V.M.3.i and V.M.3.j above, provided the following requirements are met: [§61.242-2(d)]
 - 1) Each dual mechanical seal system is:
 - a) Operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or
 - b) Equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas

- system or connected by a closed-vent system to a control device that complies with the requirements of §61.242-11; or
- c) Equipped with a system that purges the barrier fluid into a process stream with zero VHAP emissions to atmosphere.
 - 2) The barrier fluid is not in VHAP service and, if the pump is covered by standards under 40 CFR part 60, is not in VOC service.
 - 3) Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.
 - 4) Each pump is checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
 - a) If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, the pump shall be monitored as specified in §61.245 to determine the presence of VOC and VHAP in the barrier fluid.
 - b) If the monitor reading (taking into account any background readings) indicates the presence of VHAP, a leak is detected. For the purpose of this paragraph, the monitor may be calibrated with VHAP, or may employ a gas chromatography column to limit the response of the monitor to VHAP, at the option of the owner or operator.
 - c) If an instrument reading of 10,000 ppm or greater (total VOC) is measured, a leak is detected.
 - 5) Each sensor as described in Condition V.M.3.1.3) above is checked daily or is equipped with an audible alarm.
 - 6) Based on design considerations and operating experience, the permittee determines:
 - a) Criteria applicable to the presence and frequency of drips and to the sensor that indicates failure of the seal system, the barrier fluid system, or both.
 - b) If indications of liquids dripping from the pump seal exceed the criteria established in Condition V.M.3.1.6)a) above, or if, based on the criteria established in Condition V.M.3.1.6)a) above, the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.
 - c) When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after it is detected, except as provided in V.M.3.dd through V.M.3.hh below.
 - d) A first attempt at repair shall be made no later than five calendar days after each leak is detected.
 - m. Any pump that is designated, as described in V.M.4.g below, for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements in Conditions V.M.3.i, V.M.3.k and V.M.3.l above if the pump: [§61.242-2(e)]
 - 1) Has no externally actuated shaft penetrating the pump housing,
 - 2) Is demonstrated to be operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in §61.245(c), and
 - 3) Is tested for compliance with Condition V.M.3.m.2) above initially upon designation, annually, and at other times requested by the Administrator and the Department.
 - n. If any pump is equipped with a closed-vent system capable of capturing and transporting any leakage from the seal or seals to a process or fuel gas system or to a control device that complies with the requirements of Conditions V.M.3.ii through V.M.3.tt below and V.M.1.mm above, it is exempt from the requirements of Conditions V.M.3.i through V.M.3.m above. [§61.242-2(f)]
 - o. Any pump that is designated, as described in Condition V.M.4.h.1) below, as an unsafe-to-

monitor pump is exempt from the monitoring and inspection requirements of Conditions V.M.3.i and V.M.3.l.4) through V.M.3.l.6) above if: [§61.242-2(g)]

- 1) The owner or operator of the pump demonstrates that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with Condition V.M.3.i above; and
 - 2) The owner or operator of the pump has a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in Condition V.M.3.k above if a leak is detected.
- p. After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in Conditions V.M.3.dd through V.M.3.hh below. [61.242-4(b)(1)]
- q. No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in Condition V.M.3.vv below. [§61.242-4(b)(2)]
- r. Each valve shall be monitored monthly to detect leaks by the method specified in V.M.3.uu below and shall comply with Conditions V.M.3.s through V.M.3.v below, except as provided in Conditions V.M.3.w, V.M.3.x, and V.M.3.y below, V.M.1.nn through V.M.1.uu above and §61.242-1(c). [§61.242-7(a)]
- s. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. [§61.242-7(b)]
- t. Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months. [§61.242-7(c)]
- u. When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Conditions V.M.3.dd through V.M.3.hh below. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [§61.242-7(d)]
- v. First attempts at repair include, but are not limited to, the following best practices where practicable: [§61.242-7(e)]
- 1) Tightening of bonnet bolts;
 - 2) Replacement of bonnet bolts;
 - 3) Tightening of packing gland nuts; and
 - 4) Injection of lubricant into lubricated packing.
- w. Any valve that is designated, as described in Condition V.M.4.g.2) below, for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of Condition V.M.3.r above if the valve: [§61.242-7(f)]
- 1) Has no external actuating mechanism in contact with the process fluid;
 - 2) Is operated with emissions less than 500 ppm above background, as measured by the method

- specified in Condition V.M.3.vv below; and
- 3) Is tested for compliance with Condition V.M.3.w.2) above initially upon designation, annually, and at other times requested by the Administrator and the Department.
- x. Any valve that is designated, as described in V.M.4.h.1) below, as an unsafe-to-monitor valve is exempt from the requirements of Condition V.M.3.r above if: [§61.242-7(g)]
 - 1) The permittee of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with Condition V.M.3.r above; and,
 - 2) The permittee of the valve has a written plan that requires monitoring of the valve as frequent as practicable during safe-to-monitor times.
 - y. Any valve that is designated, as described in Condition V.M.4.h.2) below, as a difficult-to-monitor valve is exempt from the requirements of Condition V.M.3.r above if: [§61.242-7(h)]
 - 1) The permittee of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface;
 - 2) The process unit within which the valve is located is an existing process unit; and
 - 3) The permittee of the valve follows a written plan that requires monitoring of the valve at least once per calendar year.
 - z. If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pressure relief devices in liquid service and connectors, the permittee shall follow either one of the following procedures, except as provided in §61.242-1(c): [§61.242-8]
 - 1) The permittee shall monitor the equipment within 5 days by the method specified in V.M.3.uu below or §61.245(b) and shall comply with the requirements of Conditions V.M.3.aa through V.M.3.cc below.
 - 2) The permittee shall eliminate the visual, audible, olfactory, or other indication of a potential leak.
 - aa. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. [§61.242-8(b)]
 - bb. When a leak is detected: [§61.242-8(c)]
 - 1) It shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Conditions V.M.3.dd through V.M.3.hh below.
 - 2) The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
 - cc. First attempts at repair include, but are not limited to, the best practices described under Condition V.M.3.v above. [§61.242-8(d)]
 - dd. Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown. [§61.242-10(a)]
 - ee. Delay of repair of equipment for which leaks have been detected will be allowed for equipment that is isolated from the process and that does not remain in VHAP service. [§61.242-10(b)]
 - ff. Delay of repair for valves will be allowed if:
 - 1) The permittee demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and

- 2) When repair procedures are affected, the purged material is collected and destroyed or recovered in a control device complying with Conditions V.M.3.ii through V.M.3.ii below and V.M.1.mm above. [§61.242-10(c)]
- gg. Delay of repair for pumps will be allowed if: [§61.242-10(d)]
 - 1) Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
 - 2) Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
- hh. Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown. [§61.242-10(e)]
- ii. The permittee of closed-vent systems and control devices used to comply with provisions of 40 CFR Part 61, Subpart V shall comply with the provisions of Conditions V.M.1.n through V.M.1.mm above and V.M.3.i through V.M.3.ii below, except as provided in §61.242-1(c). [§61.242-11(a)]
- jj. Vapor recovery systems (for example, condensers and absorbers) shall be designed and operated to recover the organic vapors vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent. [§61.242-11(b)]
- kk. Enclosed combustion devices shall be designed and operated to reduce the VHAP emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent, or to provide a minimum residence time of 0.50 seconds at a minimum temperature of 760 °C. [§61.242-11(c)]
- ll. Flares used to comply with 40 CFR 61, Subpart V shall comply with the requirements of §60.18. [§61.242-11(d)]
- mm. The permittee of control devices that are used to comply with the provisions of 40 CFR Part 61, Subpart V shall monitor these control devices to ensure that they are operated and maintained in conformance with their design. [§61.242-11(e)]
- nn. Except as provided in Conditions V.M.3.qq through V.M.3.ss below, each closed vent system shall be inspected according to the following procedures and schedule, as applicable. [§61.242-11(f)]
 - 1) If the vapor collection system or closed vent system is constructed of hard-piping, the permittee shall comply with the following requirements:
 - a) Conduct an initial inspection according to the procedures in Condition V.M.3.uu below; and
 - b) Conduct annual visual inspections for visible, audible, or olfactory indications of leaks.
 - 2) If the vapor collection system or closed vent system is constructed of ductwork, the permittee shall:
 - a) Conduct an initial inspection according to the procedures in Condition V.M.3.uu below;

- and
- b) Conduct annual inspections according to the procedures in Condition V.M.3.uu below.
- oo. Leaks, as indicated by an instrument reading greater than 500 parts per million by volume above background or by visual inspections, shall be repaired as soon as practicable except as provided for in Condition V.M.3.pp below. [§61.242-11(g)]
- 1) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
 - 2) Repair shall be completed no later than 15 calendar days after the leak is detected.
- pp. Delay of repair of a closed vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown, or if the permittee determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown. [§61.242-11(h)]
- qq. If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements of Conditions V.M.3.nn.1)a) through V.M.3.nn.2) above. [§61.242-11(i)]
- rr. Any parts of the closed vent system that are designated, as described in Condition V.M.3.tt.1) below, as unsafe-to-inspect are exempt from the inspection requirements of Conditions V.M.3.nn.1)a) through V.M.3.nn.2) above if they comply with the following requirements: [§61.242-11(j)]
- 1) The permittee determines that the equipment is unsafe-to-inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with Conditions V.M.3.nn.1)a) through V.M.3.nn.2) above; and
 - 2) The permittee has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times.
- ss. Any parts of the closed vent system that are designated as difficult-to-inspect are exempt from the inspection requirements of Conditions V.M.3.nn.1)a) through V.M.3.nn.2) above if they comply with the following requirements: [§61.242-11(k)]
- 1) The permittee determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and
 - 2) The permittee has a written plan that requires inspection of the equipment at least once every 5 years. A closed vent system is exempt from inspection if it is operated under a vacuum.
- tt. The permittee shall record the following information: [§61.242-11(l)]
- 1) Identification of all parts of the closed vent system that are designated as unsafe-to-inspect, an explanation of why the equipment is unsafe-to-inspect, and the plan for inspecting the equipment.
 - 2) Identification of all parts of the closed vent system that are designated as difficult-to-inspect, an explanation of why the equipment is difficult-to-inspect, and the plan for inspecting the equipment.
 - 3) For each inspection during which a leak is detected, a record of the information specified in Condition V.M.4.e.
 - 4) For each inspection conducted in accordance with Condition V.M.3.uu below during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected.
 - 5) For each visual inspection conducted in accordance with Condition V.M.3.nn.1)b) above

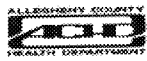
during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected.

- uu. Monitoring, as required in Conditions V.M.1.n through V.M.1.rr above, V.M.3.i through V.M.3.ii above, §V.M.1.vv through V.M.1.zz above, V.M.1.i and V.M.1.j above and V.M.3.d through V.M.3.h above, shall comply with the following requirements: [§61.245(b)]
 - 1) Monitoring shall comply with Method 21 of Appendix A of 40 CFR Part 60.
 - 2) The detection instrument shall meet the performance criteria of Method 21.
 - 3) The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21.
 - 4) Calibration gases shall be:
 - a) Zero air (less than 10 ppm of hydrocarbon in air); and
 - b) A mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm methane or n-hexane.
 - 5) The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21.
- vv. When equipment is tested for compliance with or monitored for no detectable emissions, the permittee shall comply with the following requirements: [§61.245(c)]
 - 1) The requirements of Conditions V.M.3.uu.1) through V.M.3.uu.4) above shall apply.
 - 2) The background level shall be determined, as set forth in Method 21.
 - 3) The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21.
 - 4) The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm for determining compliance.
- ww. Each piece of equipment within a process unit that can conceivably contain equipment in VHAP service is presumed to be in VHAP service unless the permittee demonstrates that the piece of equipment is not in VHAP service. For a piece of equipment to be considered not in VHAP service, it must be determined that the percent VHAP content can be reasonably expected never to exceed 10 percent by weight. For purposes of determining the percent VHAP content of the process fluid that is contained in or contacts equipment, procedures that conform to the methods described in ASTM Method D-2267 (incorporated by the reference as specified in §61.18) shall be used. [§61.245(d)(1)]
- xx. The permittee may use engineering judgment rather than the procedures in Condition V.M.3.ww above to demonstrate that the percent VHAP content does not exceed 10 percent by weight, provided that the engineering judgment demonstrates that the VHAP content clearly does not exceed 10 percent by weight. When the permittee and the Department do not agree on whether a piece of equipment is not in VHAP service, however, the procedures in Condition V.M.3.ww above shall be used to resolve the disagreement. If the permittee determines that a piece of equipment is in VHAP service, the determination can be revised only after following the procedures in Condition V.M.3.ww above. [§61.245(d)(2)]
- yy. Samples used in determining the percent VHAP content shall be representative of the process fluid that is contained in or contacts the equipment or the gas being combusted in the flare. [§61.245(d)(3)]
- zz. The permittee shall inspect the Methanol tanks (V-400 and V-410) and the MEA/Methanol tank

(V-430) daily in order to comply with Condition V.M.1.ccc above when the equipment is in operation. [ACHD Installation Permit 0052-I004a and §2102.04.e]

4. Record Keeping Requirements:

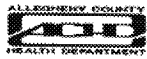
- a. The following information pertaining to the design of control equipment installed to comply with Conditions V.M.1.a through V.M.1.g above and Conditions V.M.3.a and V.M.3.b shall be recorded and kept in a readily accessible location. [§61.138(a)]
 - 1) Detailed schematics, design specifications, and piping and instrumentation diagrams.
 - 2) The dates and descriptions of any changes in the design specifications.
- b. The following information pertaining to sources subject to Conditions V.M.1.a through V.M.1.e above and sources subject to Conditions V.M.1.f and V.M.1.g above shall be recorded and maintained for 2 years following each semiannual (and other) inspection and each annual maintenance inspection: [§61.138(b)]
 - 1) The date of the inspection and the name of the inspector.
 - 2) A brief description of each visible defect in the source or control equipment and the method and date of repair of the defect.
 - 3) The presence of a leak, as measured using the method described in Condition V.M.3.vv above. The record shall include the date of attempted and actual repair and method of repair of the leak.
 - 4) A brief description of any system abnormalities found during the annual maintenance inspection, the repairs made, the date of attempted repair, and the date of actual repair.
- c. Each permittee subject to the provisions of 40 CFR 61, Subpart V shall comply with the recordkeeping requirements of this section. The permittee of more than one process unit subject to the provisions of this 40 CFR Part 61, Subpart V may comply with the recordkeeping requirements for these process units in one recordkeeping system if the system identifies each record by each process unit. [§61.246(a)]
- d. When each leak is detected as specified in Conditions V.M.3.i through V.M.3.k above, V.M.1.t through V.M.1.cc above, V.M.3.r through V.M.3.cc above and V.M.3.d through V.M.3.h above, the following requirements apply: [§61.246(b)]
 - 1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
 - 2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in Condition V.M.3.t above and no leak has been detected during those 2 months.
 - 3) The identification on equipment, except on a valve, may be removed after it has been repaired.
- e. When each leak is detected as specified in Conditions V.M.3.i through V.M.3.k above, V.M.1.t through V.M.1.cc above, V.M.3.r through V.M.3.cc above and V.M.3.d through V.M.3.h above, the following information shall be recorded in a log and shall be kept for 2 years in a readily accessible location: [§61.246(c)]
 - 1) The instrument and operator identification numbers and the equipment identification number.
 - 2) The date the leak was detected and the dates of each attempt to repair the leak.
 - 3) Repair methods applied in each attempt to repair the leak.



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- 4) "Above 10,000" if the maximum instrument reading measured by the methods specified in Conditions V.M.3.uu through V.M.3.xx above after each repair attempt is equal to or greater than 10,000 ppm.
 - 5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
 - 6) The signature of the permittee (or designate) whose decision it was that repair could not be effected without a process shutdown.
 - 7) The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days.
 - 8) Dates of process unit shutdowns that occur while the equipment is unrepaired.
 - 9) The date of successful repair of the leak.
- f. The following information pertaining to the design requirements for closed-vent systems and control devices described in V.M.3.ii through V.M.3.tt above and V.M.1.mm above shall be recorded and kept in a readily accessible location: [§61.246(d)]
- 1) Detailed schematics, design specifications, and piping and instrumentation diagrams.
 - 2) The dates and descriptions of any changes in the design specifications.
 - 3) A description of the parameter or parameters monitored, as required in Condition V.M.3.mm above, to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring.
 - 4) Periods when the closed-vent systems and control devices required in Conditions V.M.3.i through V.M.3.k above, V.M.1.d through V.M.1.i above, V.M.3.p and V.M.3.q above, and V.M.1.dd through V.M.1.gg above are not operated as designed, including periods when a flare pilot light does not have a flame.
 - 5) Dates of startups and shutdowns of the closed-vent systems and control devices required in Conditions V.M.3.i through V.M.3.k above, V.M.1.d through V.M.1.i above, V.M.3.p and V.M.3.q above, and V.M.1.dd through V.M.1.gg above.
- g. The following information pertaining to all equipment to which a standard applies shall be recorded in a log that is kept in a readily accessible location: [§61.246(e)]
- 1) A list of identification numbers for equipment (except welded fittings) subject to the requirements of this 40 CFR Part 60, Subpart V.
 - 2) A list of identification numbers for equipment that the permittee elects to designate for:
 - a) No detectable emissions as indicated by an instrument reading of less than 500 ppm above background.
 - b) The designation of this equipment for no detectable emissions shall be signed by the permittee.
 - 3) A list of equipment identification numbers for pressure relief devices required to comply with Condition V.M.1.dd above.
 - 4) The following information shall be recorded:
 - a) The dates of each compliance test required in Conditions V.M.1.y above, V.M.1.dd above, V.M.3.p and V.M.3.q above, V.M.3.w above, and V.M.3.g above.
 - b) The background level measured during each compliance test.
 - c) The maximum instrument reading measured at the equipment during each compliance test.
 - 5) A list of identification numbers for equipment in vacuum service.
- h. The following information pertaining to all valves subject to the requirements of Conditions V.M.4.h and V.M.4.i below and to all pumps subject to the requirements of §61.242-2(g) shall be



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- recorded in a log that is kept in a readily accessible location: [§61.246(f)]
- 1) A list of identification numbers for valves and pumps that are designated as unsafe to monitor, an explanation for each valve or pump stating why the valve or pump is unsafe to monitor, and the plan for monitoring each valve or pump.
 - 2) A list of identification numbers for valves that are designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the planned schedule for monitoring each valve.
- i. The following information shall be recorded for valves complying with Conditions V.M.1.ss through V.M.1.uu above.
- 1) A schedule of monitoring.
 - 2) The percent of valves found leaking during each monitoring period.
- j. The following information shall be recorded in a log that is kept in a readily accessible location: [§61.246(h)]
- 1) Design criterion required in V.M.1.y and V.M.3.e.4) above and an explanation of the design criterion; and
 - 2) Any changes to this criterion and the reasons for the changes.
- k. The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in the applicability section of 40 CFR 61, Subpart V and other specific subparts: [§61.246(i)]
- 1) An analysis demonstrating the design capacity of the process unit, and
 - 2) An analysis demonstrating that equipment is not in VHAP service.
- l. Information and data used to demonstrate that a piece of equipment is not in VHAP service shall be recorded in a log that is kept in a readily accessible location. [§61.246(j)]
- m. The permittee shall maintain records of the monthly amount of coke oven gas, in mmcf, that is: [§2103.12.j]
- 1) Combusted in coke battery underfiring;
 - 2) Combusted in boilers and other facilities at the Clairton Works;
- n. The permittee shall maintain records of the monthly amount of natural gas, in mmcf, received from the Koppers facility gas blanketing system. [§2103.12.j]
- o. The permittee shall maintain the following records regarding benzene in facility wastes in a readily accessible location at the facility site for a period not less than five (5) years from the date the information is recorded unless otherwise specified. This information shall include: [§61.356(a) & §2103.12.j]
- 1) The identification of each waste stream at the facility subject 40 CFR Part 61, Subpart FF, and indicate whether or not the waste stream is controlled for benzene emissions in accordance with 40 CFR Part 61, Subpart FF. [§61.356(b)]
 - 2) For each waste stream not controlled for benzene emissions in accordance with 40 CFR Part 61, Subpart FF, the records shall include all test results, measurements, calculations, and other documentation used to determine the following information for the waste stream: waste stream identification, water content, whether or not the waste stream is a process wastewater stream, annual waste quantity, range of benzene concentrations, annual average flow-

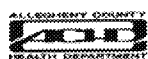
weighted benzene concentration, and annual benzene quantity. [§61.356(b)(1)]

- p. The permittee shall keep monthly records of the throughput, the types of liquids stored and the maximum true vapor pressure of the liquid as stored in storage tanks V-400, V-410 and V-430. [ACHD Installation Permit No. 0052-1004a and §2103.12.j]
- q. For volatile organic compounds whose storage temperature is governed by ambient weather conditions, the vapor pressure under actual storage conditions shall be determined using a temperature which is representative of the average storage temperature for the hottest month of the year in which such storage takes place. [§2105.12(d)]

5. Reporting Requirements:

- a. The permittee shall submit a statement in writing notifying the Administrator and the Department that the requirements of 40 CFR 61, Subparts L & V, have been implemented. The statement is to contain the following information for each source: [§61.138(e)]
 - 1) Type of source (e.g., a light-oil sump or pump).
 - 2) For equipment in benzene service, equipment identification number and process unit identification; percent by weight benzene in the fluid at the equipment; and process fluid state in the equipment (gas/vapor or liquid).
 - 3) Method of compliance with the standard (e.g., "gas blanketing," "monthly leak detection and repair," or "equipped with dual mechanical seals").
- b. The permittee shall submit a report semiannually in accordance with General Condition III.15.d above, which includes the following information: [§61.138(f)]
 - 1) For sources subject to Conditions V.M.1.a through V.M.1.e above and sources subject to Conditions V.M.1.f and V.M.1.g above,
 - a) A brief description of any visible defect in the source or ductwork,
 - b) The number of leaks detected and repaired, and
 - c) A brief description of any system abnormalities found during each annual maintenance inspection that occurred in the reporting period and the repairs made.
 - 2) For equipment in benzene service subject to V.M.1.i above, information required by V.M.5.c.
 - 3) For each exhauster subject to V.M.1.i and V.M.1.j above and V.M.3.d through V.M.3.h above for each quarter during the semiannual reporting period,
 - a) The number of exhausters for which leaks were detected as described in Conditions V.M.3.d and V.M.3.e.5) above,
 - b) The number of exhausters for which leaks were repaired as required in Conditions V.M.3.d and V.M.3.e.6) above
 - c) The results of performance tests to determine compliance with Condition V.M.3.g above conducted within the semiannual reporting period.
 - 4) A statement signed by the permittee stating whether all provisions of 40 CFR Part 61, Subpart L, have been fulfilled during the semiannual reporting period.
 - 5) Revisions to items reported according to Condition V.M.5.a above if changes have occurred since the initial report or subsequent revisions to the initial report.
- c. The semiannual report in Condition V.M.5.b above shall also include the following information: [§61.247(b)]

- 1) Process unit identification.
- 2) For each month during the semiannual reporting period,
 - a) Number of valves for which leaks were detected as described in V.M.3.s above or V.M.1.ee through V.M.1.gg above.
 - b) Number of valves for which leaks were not repaired as required in V.M.3.u above.
 - c) Number of pumps for which leaks were detected as described in V.M.3.j above.
 - d) Number of pumps for which leaks were not repaired as required in V.M.3.k above.
 - e) Number of compressors for which leaks were detected as described in V.M.1.v above.
 - f) Number of compressors for which leaks were not repaired as required in V.M.1.w above.
 - g) The facts that explain any delay of repairs and, where appropriate, why a process unit shutdown was technically infeasible.
 - h) Dates of process unit shutdowns which occurred within the semiannual reporting period.
 - i) The results of all performance tests and monitoring to determine compliance with no detectable emissions and with Conditions V.M.1.nn through V.M.1.aaa above conducted within the semiannual reporting period.
- d. An owner or operator electing to comply with the provisions of Conditions V.M.1.nn through V.M.1.aaa above shall notify the Administrator and the Department of the alternative standard selected 90 days before implementing either of the provisions. [§61.247(d)]
- e. If the total annual benzene quantity from facility waste is less than 10 Mg/yr (11 ton/yr) but is equal to or greater than 1 Mg/yr (1.1 ton/yr), then the permittee shall submit to the Administrator and the Department a report that updates the following information: [§61.357(a)(1), (a)(2), (a)(3) and (c)]
 - 1) Total annual benzene quantity from facility waste determined in accordance with Condition V.M.2.b above. [§61.357(a)(1)]
 - 2) A table identifying each waste stream and whether or not the waste stream will be controlled for benzene emissions in accordance with the requirements of 40 CFR 61, Subpart FF. [§61.357(a)(2)]
 - 3) For each waste stream identified as not being controlled for benzene emissions in accordance with the requirements of 40 CFR 61, Subpart FF, the following information shall be added to the table: [§61.357(a)(3)]
 - a) Whether or not the water content of the waste stream is greater than 10 percent;
 - b) Whether or not the waste stream is a process wastewater stream, product tank drawdown, or landfill leachate;
 - c) Annual waste quantity for the waste stream;
 - d) Range of benzene concentrations for the waste stream;
 - e) Annual average flow-weighted benzene concentration for the waste stream; and
 - f) Annual benzene quantity for the waste stream.
 - 4) The report shall be submitted annually and whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 10 Mg/yr (11 ton/yr) or more. If the information in the annual report required by Conditions V.M.5.e.1) through V.M.5.e.3) above is not changed in the following year, the permittee may submit a statement to that effect. [§61.357(c)]
- f. The types of liquid stored in storage tanks V-400, V-410 and V-430, and the 12-month rolling totals of the throughput shall be reported to the Department on a semi-annual basis. [ACHD Installation Permit No. 0052-1004a and §2103.12.k.1]



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- g. The permittee shall submit notification of intent to store any new material in storage tanks V-400, V-410 and V-430 other than methanol (V-400 and V-410) or MEA/methanol (V-430), to the Department a minimum of ten (10) working days prior to the intended store date. This notification shall at a minimum include the Material Safety Data Sheet and emission calculation for the new material. [ACHD Installation Permit No. 0052-1004a and §2103.12.k.1]

6. Work Practice Standards:

- a. The By-Products Plant Clean Coke Oven Gas Blanketing System and all process units blanketed by this system shall be properly maintained and operated according to good engineering and air pollution control practices at all times. [§2105.06; RACT Plan 234]

7. Additional Requirements:

The following definitions in 40 CFR 61, Subparts L, V and FF and 40 CFR 63, Subpart L are incorporated by reference into this permit:

40 CFR 61.131
40 CFR 61.241
40 CFR 61.341

PERMIT SHIELD IN EFFECT

N. No. 1 and No. 2 Continuous Barge Unloaders: P022 & P023

Process Description: Continuous unloading of coal from barge
Facility ID: P022 and P023
Max. Design Rate: 4,598,635 tons of coal per year, each
Capacity: 4,598,635 tons of coal per year, each
Raw Materials: Coal
Control Device: NA

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the continuous barge unloaders in such manner that the opacity of visible emissions from the coal unloading operation, excluding uncombined water: [§2105.40.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the affected source. [§2104.05]
- c. The permittee shall not cause to be discharged into the atmosphere from the No. 2 Continuous Barge Unloader gases which exhibit 20 percent opacity or greater [§60.254(a)].
- d. The opacity standards in condition V.N.1.c shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in 40CFR Part 60 Subpart Y. [§60.11(c)]

2. Testing Requirements:

- a. An owner or operator of each affected facility that commenced construction, reconstruction, or modification on or before April 28, 2008, must conduct all performance tests required by §60.8 to demonstrate compliance with the applicable emission standards using the methods identified in §60.257 [§60255(a)].
- b. Compliance with opacity standards in condition V.N.1.c shall be determined by conducting observations in accordance with Method 9 in appendix A of subpart 60 or any alternative method that is approved by the Administrator and the Department, or as provided in §60.11(e)(5). For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard) [§60.11(b)].
- c. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

The permittee shall perform annual visible emission observations for a period of one hour for the No. 1 and No. 2 Continuous Barge Unloaders to determine compliance with Condition V.N.1.a above. [§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record the annual visible emission observations. [§2103.12.j]

5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department and the annual visible emission observations in accordance with General Condition III.15.d above. [§2103.12.k]

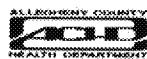
6. Work Practice Standards:

- a. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator and the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source [§60.11(d)].

7. Additional Requirements:

- a. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in this part, nothing in this part shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed [§60.11(g)].
- b. No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere [§60.12].

PERMIT SHIELD IN EFFECT



**EMISSION UNIT TERMS
AND CONDITIONS**

**U. S. Steel Clairton Works
Title V Operating Permit No. 0052**

O. Pedestal Crane Unloader: P024

Process Description: Unload coal from barge
Facility ID: P024
Max. Design Rate: 2,792,250 tons of coal per year
Capacity: 2,792,250 tons of coal per year
Raw Materials: Coal
Control Device: NA

As identified above, Process P024 consists of the following number and type of equipment:
Pedestal crane unloader

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the pedestal crane unloader in such manner that the opacity of visible emissions from the coal unloading operation, excluding uncombined water: [§2105.40.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the affected source. [§2104.05]

2. Testing Requirements:

The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements

The permittee shall perform annual visible emission observations for a period of one (1) hour for the Pedestal Crane Unloader to determine compliance with Condition V.O.1.a above. [§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record the annual visible emission observations. [§2103.12.j]

5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department and the annual visual emission observations in accordance with General Condition III.15.d above. [§2103.12.k]

PERMIT SHIELD IN EFFECT

P. Wharf Crane Unloader: P025

Process Description: Unload coal from barge
Facility ID: P025
Max. Design Rate: 2,978,400 tons of coal per year
Capacity: 2,792,250 tons of coal per year
Raw Materials: Coal
Control Device: NA

As identified above, Process P025 consists of the following number and type of equipment: - Clam shell unloader

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the clam shell unloader in such manner that the opacity of visible emissions from the coal unloading operation, excluding uncombined water: [§2104.40.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the affected source. [§2104.05]

2. Testing Requirements:

The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

The permittee shall perform annual visible emission observations for a period of one (1) hour for the Wharf Crane Unloader to determine compliance with Condition V.P.1.a above. [§2103.12.i]

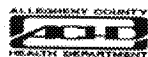
4. Record Keeping Requirements:

The permittee shall record the annual visual emission observations. [§2103.12.j]

5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department and the annual visual emission observations in accordance with General Condition III.15.d above.[§2103.12.k]

PERMIT SHIELD IN EFFECT



EMISSION UNIT TERMS AND CONDITIONS

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Q. Coal Transfer: P026

Process Description: Unload coal from barge
Facility ID: P026
Max. Design Rate: 8,240,605 tons of coal per year
Capacity: 8,240,605 tons of coal per year
Raw Materials: Coal
Control Device: Dust suppressant(s)

As identified above, Process P026 consists of the following number and type of equipment: Coal conveyor and transfer towers; deflector plates, hoppers and chutes installed on belts 1A and 1B

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the Coal Transfer Station (P026) in such manner that the opacity of visible emissions from the coal unloading operation, excluding uncombined water: [§2104.40.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall maintain and operate the deflector plates, hoppers and chutes installed on belts 1A and 1B. [§2104.02.e.4]
- c. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the affected source. [§2104.05]

2. Testing Requirements:

The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

The permittee shall perform annual visible emission observations for a period of one (1) hour for the Coal Transfer Station (P026) to determine compliance with Condition V.Q.1.a above [§2103.12.i]

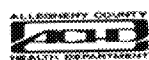
4. Record Keeping Requirements:

The permittee shall record the annual visual emission observations. [§2103.12.j]

5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department and the annual visual emission observations in accordance with General Condition III.15.d above.[§2103.12.k]

PERMIT SHIELD IN EFFECT



EMISSION UNIT TERMS AND CONDITIONS

U. S. Steel Clairton Works
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R. No. 1 Primary and Secondary Pulverizers (P027 & P028) and No. 2 Primary and Secondary Pulverizers (P029 & P030)

Process Description: Pulverize coal
Facility ID: P027, P028, P029 and P030
Max. Design Rate: P027 & P028: 4,598,635 tons of coal per year, each; P029 & P030: 3,641,605 tons of coal per year, each.
Capacity: P027 & P028: 4,598,635 tons of coal per year, each; P029 & P030: 3,641,605 tons of coal per year, each.
Raw Materials: Coal
Control Device: Feed chutes to the pulverizers are enclosed and dust suppressant applied to the coal prior to entering the pulverizers.

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the No. 1 Primary Coal Pulverizer in such manner that the opacity of visible emissions from the coal pulverizing operation, excluding uncombined water: [§2104.01.a]
- 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
2) Equal or exceed an opacity of 60% at any time.

- b. The permittee shall not operate, or allow to be operated, any primary or secondary coal pulverizer listed below unless there is installed on such process an emission control device, nor shall any person operate, or allow to be operated, any pulverizer listed below in such manner that emissions of PM-10 from such process exceed at any time the applicable rate set forth below for a volume source for ambient air quality impact dispersion modeling purposes, or if the required emission control device results in the process becoming a point source for ambient air quality impact dispersion modeling purposes, a rate which results in no more adverse ambient air quality impact than the applicable rate set forth below for a volume source. [§2104.02.e]

This requirement shall apply to the sum of all stack emissions from the coal pulverizers listed below including all emissions from any air pollution control device outlet(s) associated with the pulverizers. All fugitive emissions from the coal pulverizers shall be included in the sum of all stack emissions unless the stack emissions can be accurately measured and all fugitive emissions do not exceed the standards established by §2104.01 or any alternative standard(s) established for such source pursuant to §2104.01.

SPECIFIC PROCESS SOURCE

1. #1 Primary Coal Pulverizer
2. #1 Secondary Coal Pulverizer
3. #2 Primary Coal Pulverizer
4. #2 Secondary Coal Pulverizer

VOLUME SOURCE MAXIMUM ALLOWABLE EMISSION RATE

- 5.17 grains/ton of coal
11.86 grains/ton of coal
8.26 grains/ton of coal
11.02 grains/ton of coal

The permittee shall install a direct feed chute and distribution plough at the #2 secondary pulverizer and enclose all coal feed chutes on the pulverizers. [§2104.02.e.1 through e.4]

- c. The permittee shall use dust suppressant (e.g. chemical, oil, or water suppressant to minimize emissions) on coal prior to entry into any pulverizer. [§2104.02.e.1 through e.4]
- d. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the U. S. Steel Clairton Works. [§2104.05]

2. Testing Requirements:

The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

The permittee shall monitor the total amount and type of dust suppressant applied to the coal at all of the pulverizers on a monthly basis.
[§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record and maintain monthly records of the tons of coal processed through the Primary and Secondary Coal Pulverizers. [§2103.12.j]

5. Reporting Requirements:

The permittee shall submit reports semiannually to the Department as required in General Condition III.15.d above and the type and total amount of dust suppressant applied at all of the pulverizers.
[§2103.12.k]

PERMIT SHIELD IN EFFECT

S. Surge Bins and Bunkers: P031

Process Description: Pulverized Coal Storage (No. 1 unit surge bin, No. 2 unit surge bin, and Bunkers 1,3,5,7 and B.)
Facility ID: P031
Max. Design Rate: 8,240,605 tons of coal per year
Capacity: 8,240,605 tons of coal per year
Raw Materials: Pulverized coal
Control Device: NA

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the pulverized coal surge bins and bunkers (P031) in such manner that the opacity of visible emissions from the coal unloading operation, excluding uncombined water: [§2104.40.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the affected source. [§2104.05]

2. Testing Requirements:

The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

The permittee shall perform annual visible emission observations for a period of one (1) hour at the Coal Surge Bins and Bunkers (P031) to determine compliance with Condition V.S.1.a.1) above. [§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record the annual visual emission observations. [§2103.12.j]

5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department and the annual visible emission observations in accordance with General Condition III.15.d above.[§2103.12.k]

PERMIT SHIELD IN EFFECT



**EMISSION UNIT TERMS
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**U. S. Steel Clairton Works
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T. Coke Transfer: P032 & P033

Process Description: Transfer of coke via belt conveyors from the coke wharf to the screening stations (P032 for Batteries 1-3, 7-9 & B and P033 for Batteries 13-15 and 19&20)
Facility ID: P032 and P033
Max. Design Rate: P032: 3,568,240 tons of coke per year; P033: 2,825,830 tons of coke per year
Capacity: P03: 3,568,240 tons of coke per year; P033: 2,825,830 tons of coke per year
Raw Materials: Metallurgical coke
Control Device: NA

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the coke transfer operations (P032 and P033) in such manner that the opacity of visible emissions from the coal unloading operation, excluding uncombined water: [§2104.40.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the affected source. [§2104.05]

2. Testing Requirements:

The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements

The permittee shall perform annual visible emission observations for a period of one (1) hour for the Coke Transfer operations (P032 & P033) to determine compliance with Condition V.T.1.a above. [§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record the annual visual emission observations. [§2103.12.j]

5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department and the annual visual emission observations in accordance with General Condition III.15.d above.[§2103.12.k]

PERMIT SHIELD IN EFFECT

U. No. 1 and No. 2 Coke Screening Stations: P034 & P035

Process Description: Screening of coke (P034 for Batteries 1-3 & 7-9 and P035 for Batteries 13-15 and 19 & 20)
Facility ID: P034 & P035
Max. Design Rate: P034: 2,411,190 tons of coke per year; P035: 2,825,830 tons of coke per year
Capacity: P034: 2,411,190 tons of coke per year; P035: 2,825,830 tons of coke per year
Raw Materials: Metallurgical coke
Control Device: NA

As identified above, Process P034 consists of the following number and type of equipment: Coke screening (P034 for Batteries 1-3 and P035 for Batteries 13-15 and 19 & 20) Screening loadout (P034 for Batteries 1-3 and P035 for Batteries 13-15 and 19 & 20)

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the No. 1 or No. 2 Coke Screening Station (P034 & P035) in such manner that the opacity of visible emissions from the screening operation, excluding uncombined water: [§2104.40.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not operate or allow to be operated, the No. 1 or No. 2 Coke Screening Station unless each screening station, at a minimum, is located and maintained within the enclosure in existence as of February 1, 1994. [§2104.02.g]
- c. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the affected source. [§2104.05]

2. Testing Requirements:

The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements

The permittee shall perform annual visible emission observations for a period of one (1) hour for the No. 1 and No. 2 Coke Screening Stations (P03 & P035) to determine compliance with Condition V.U.1.a above. [§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record the coke screening stations (P034 & P035) annual visible emission observations. [§2103.12.j]



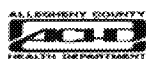
**EMISSION UNIT TERMS
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5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department and the annual visual emission observations in accordance with General Condition III.15.d above.[§2103.12.k]

PERMIT SHIELD IN EFFECT



EMISSION UNIT TERMS AND CONDITIONS

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V. Coke Screening Station No. 3: P036

Process Description: Screening of coke and Screening loadout (Battery B)
Facility ID: P036
Max. Design Rate: 1,157,050 tons of coke per year
Capacity: 550 tons of coke per hour
Raw Materials: Metallurgical coke
Control Device: Reverse Pulse jet baghouse

I. Restrictions:

- a. The permittee shall not operate, or allow to be operated, Coke Screening Station No. 3 (P036) in such manner that the opacity of visible emissions from the coke loading operation, excluding uncombined water: [Installation Permit 0052-1003, 1/23/98 and §2104.40.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the affected source. [Installation Permit 0052-1003, 1/23/98 and §2104.05]
- c. Particulate emissions from the baghouse outlet at the No. 3 Screening Station shall not exceed 0.78 lb/hour or 3.42 tons/year. [Installation Permit 0052-1003, 1/23/98]
- d. The permittee shall not operate, or allow to be operated, the Coke Screening #3 process, unless there is installed on such process an emission control device, nor shall the permittee operate, or allow to be operated such process in such manner that emissions of PM-10 from such process exceed 2.8 grains/ton of coke at any time. [§2104.02.f and Consent Order and Agreement (COA), Third Ammendment, July 6, 2011, Condition K]
- e. The emission limitation in Condition V.V.1.d above shall apply to the sum of all stack emissions from Coke Screening #3 process including all emissions from any air pollution control device outlet(s) associated with the No. 3 Screening Station. All fugitive emissions from the screening station shall be included in the sum of all stack emissions for purposes of this condition unless the stack emissions can be accurately measured and all fugitive emissions do not exceed the standards established by §2104.01 or any alternative standard(s) established for the No. 3 Screening Station such pursuant to §2104.01. [§2104.02.f]
- f. The baghouse for the No. 3 Screening Station shall be properly installed, maintained and operated consistent with good air pollution control practice, and in accordance with the manufacturer's recommendations and practices at all times that coke is screened, conveyed, and loaded out. [Installation Permit 0052-1003, 1/23/98 and §2105.03]
- g. The pressure drop across the No. 3 Coke Screening Station baghouse shall be maintained between 1 and 8 inches W.C. [§2105.03; Consent Order and Agreement (COA), Third Ammendment, July 6, 2011]
- h. Emissions from Coke Screening Station No. 3 (P036) shall not exceed the limits listed in Table

V-V-1 at any time: [Installation Permit 0052-I003, 1/23/98; §2105.03 and Consent Order and Agreement (COA), Third Amendment, July 6, 2011]

**TABLE V-V-1
 Emission Limitation**

POLLUTANT	HOURLY EMISSION LIMIT (lb/hr)	ANNUAL EMISSION LIMIT (tons/year)*
PM/PM-10 (Coke screening baghouse)	0.78	3.42

2. Testing Requirements

- a. The permittee shall perform testing on the No. 3 coke screening station baghouse outlet and shall conduct subsequent emission testing at least once every five (5) years thereafter, to determine compliance with the PM/PM-10 emission limitation of 0.78 lbs/hour as specified in Table 1 above. Particulate emission tests shall be conducted according to the methodology specified in 40 CFR 60, Appendix A, Methods 1 through 5. The permittee shall submit a stack test protocol to the Department at least 45 days prior to the test dates. During each stack test performed, simultaneous visible emission evaluations shall be conducted according to the methodology specified in 40 CFR 60, Appendix A, Method 9, except for the provisions of Section 2.5 of Method 9. [§2102.04.e and §2108.02.e]
- b. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

The permittee shall monitor and record the pressure drop across the baghouse. [§2103.12.i and Consent Order and Agreement (COA), Third Amendment, July 6, 2011]

4. Record Keeping Requirements:

- a. Monthly records shall be maintained of all coke tonnages processed and loaded out through the screening station. Monthly records shall be kept of all inspections, maintenance, repairs, and emission control unit operating data. [Installation Permit 0052-I003, 1/23/98 and §2103.12.j]
- b. The permittee shall record the pressure drop across the baghouse at least once per day. [§2103.12.j and Consent Order and Agreement (COA), Third Amendment, July 6, 2011]

5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15.d above of the monthly tons of coke throughput to the No. 3 Coke Screening Station and the daily reading of the pressure drop across the baghouse as specified in Condition V.V.4.b above. [§2103.12.k]

6. Workpractice Requirements:

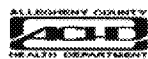
None except as provided elsewhere in the permit

7. **Additional Requirements:**

The permittee shall achieve continuous compliance with the No. 3 Screening Station particulate emission limitations in Article XXI, §2104.02.f, or when the proposed revision to §2104.02.f is approved by U. S. EPA in a SIP revision. [§2103.12.d; Consent Order and Agreement (COA), Third Amendment, July 6, 2011]

- 1) Begin construction of a new baghouse six months after receipt of an installation permit and revision of the emission limit in §2104.02.f; and
- 2) Complete construction of the new baghouse 12 months after receipt of the installation permit.

PERMIT SHIELD IN EFFECT



**EMISSION UNIT TERMS
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**U. S. Steel Clairton Works
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W. Boom Conveyor (coal pile destocking): P041

Process Description: Coal transfer operations (belt conveyors) from storage piles to barges
Facility ID: P041
Max. Design Rate: 5,584,500 tons of coal per year
Capacity: 5,584,500 tons of coal per year
Raw Materials: Coal
Control Device: NA

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the boom conveyor (P041) in such manner that the opacity of visible emissions excluding uncombined water: [§2104.01.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line of the affected source. [§2104.05]

2. Testing Requirements:

None, except as may be provided elsewhere in this permit.

3. Monitoring Requirements:

The permittee shall perform monthly visible emission observations of the boom conveyor operations (P026) to determine compliance with Condition V.W.1.a above. [§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record the monthly tons of coal transferred by the boom conveyor and the monthly visual emission observations. [§2103.12.j]

5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15.d above of the monthly tons of coal transferred by the boom conveyor and the monthly visual emission observations. [§2103.12.k]

PERMIT SHIELD IN EFFECT

X. Coal and Coke Recycle Screening: P042

Process Description: Screening of recycle coal and coke
Facility ID: P042
Max. Design Rate: 262,800 tons of coal and/or coke per year
Capacity: 30 tons of coal and/or coke per hour
Raw Materials: Coal and metallurgical coke
Control Device: NA

As identified above, Process P042 consists of the following number and type of equipment: Coal and coke screening operations

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the coal and coke recycle screening operation (P042) in such manner that the opacity of visible emissions from the screening operation, excluding uncombined water: [§2104.01.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not operate, or allow to be operated, the Coal and Coke Recycle Screening (P042) operation, in such manner that emissions of particulate matter from such process exceed 11.2 pounds per hour (lb/hr) at any time as determined by the formula set forth in §2104.02.c. This emission limitation shall apply to the sum of all stack emissions from process P042 process including all emissions from any air pollution control device outlet(s) associated with process P042. All fugitive emissions from process P042 shall be included in the sum of all stack emissions for purposes of this emission limitation, unless the stack emissions can be accurately measured and all fugitive emissions do not exceed the standards established by §2104.01 or any alternative standard(s) established for process P042 pursuant to §2104.01. [§2104.02.c.3]

2. Testing Requirements:

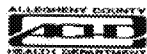
None, except as may be provided elsewhere in this permit.

3. Monitoring Requirements:

The permittee shall perform annual visible emission observations for a period of one (1) hour for the coal and coke recycle screening operations (P026) to determine compliance with Condition V.X.1.a above. [§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record the recycle screening station annual visible emission observations. [§2103.12.j]



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5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15.d above the annual visible emission observations. [§2103.12.k]

PERMIT SHIELD IN EFFECT

Y. Peters Creek Coke Screening: P043

Process Description: Screening of metallurgical coke
Facility ID: P043
Max. Design Rate: 3,066,000 tons of coke per year
Capacity: 350 tons of coke per hour
Raw Materials: Metallurgical coke
Control Device: NA

As identified above, Process P043 consists of the following number and type of equipment:
 Coke screening operations

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated, the coke screening operation (P043) in such manner that the opacity of visible emissions from the screening operation, excluding uncombined water: [§2104.01.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- b. The permittee shall not operate, or allow to be operated, the Peters Creek Coke Screening operation, in such manner that emissions of particulate matter from such process exceed 31.3 pounds per hour (lb/hr) at any time as determined by the formula set forth in §2104.02.c. This emission limitation shall apply to the sum of all stack emissions from coke screening (P043) including all emissions from any air pollution control device outlet(s) associated with process P043. All fugitive emissions from process P043 shall be included in the sum of all stack emissions for purposes of this emission limitation unless the stack emissions can be accurately measured and all fugitive emissions do not exceed the standards established by §2104.01 of this Article or any alternative standard(s) established for process P043 pursuant to §2104.01 of this Article. [§2104.02.c.3]

2. Testing Requirements:

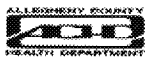
None, except as may be provided elsewhere in this permit.

3. Monitoring Requirements:

The permittee shall perform annual visible emission observations for a period of one hour for the coke screening (P043) operations to determine compliance with Condition V.Y.1.a above. [§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record the annual visible emission observations. [§2103.12.j]



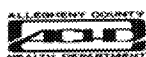
**EMISSION UNIT TERMS
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5. Reporting Requirements:

The permittee shall submit semiannual reports of the visual emission observations to the Department in accordance with General Condition III.15.d above. [§2103.12.k]

PERMIT SHIELD IN EFFECT



EMISSION UNIT TERMS AND CONDITIONS

U. S. Steel Clairton Works
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Z. Light Oil Barge Loadin: P044

Process Description: Loading light oil, tar and tar distillates into barges, trucks and rail cars
Facility ID: P044
Max. Design Rate: 55,000,000 gallons per year (1,310,000 barrels per year)
Capacity: 55,000,000 gallons per year (1,310,000 barrels per year)
Raw Materials: Light Oil (55,000,000 gal/yr), Tar and Tar Distillates (55,000,000 gal/yr)
Control Device: Vapor recovery system for barge and truck loading

1. Restrictions:

- a. The permittee shall equip each terminal with a vapor collection system that is designed to collect HAP vapors displaced from marine tank vessels during marine tank vessel loading operations and to prevent HAP vapors collected at one loading berth from passing through another loading berth to the atmosphere, except for those commodities exempted under §63.560(d). [§2103.12.h.6; §63.562(b)(1)(i)]
- b. The permittee shall limit marine tank vessel loading operations to those vessels that are equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [§2103.12.h.6; §63.562(b)(1)(ii)]
- c. The permittee shall limit marine tank vessel loading operations to those vessels that are vapor tight and to those vessels that are connected to the vapor collection system. [§2103.12.h.6; §63.562(b)(1)(iii)]
- d. The permittee shall reduce captured HAP emissions from marine tank vessel loading operations by 97 weight-percent, as determined using methods in §63.565 (d) and (l). [§2103.12.h.6; §63.562(b)(2)]
- e. The following procedures shall be used to determine compliance with the emissions limits under Condition V.Z.1.a above: [§2103.12.h.6; §63.563(a)]
 - 1) *Vent stream by-pass requirements for the terminal's vapor collection system.*
 - a) In accordance with Condition V.Z.1.a above, each valve in the terminal's vapor collection system that would route displaced vapors to the atmosphere, either directly or indirectly, shall be secured closed during marine tank vessel loading operations either by using a car-seal or a lock-and-key type configuration, or the by-pass line from the valve shall be equipped with a flow indicator, except for those valves used for pressure/vacuum relief, analyzers, instrumentation devices, sampling, and venting for maintenance. Marine tank vessel loading operations shall not be performed with open by-pass lines.
 - b) Repairs shall be made to valves, car-seals, or closure mechanisms no later than 15 days after a change in the position of the valve or a break in the car-seal or closure mechanism is detected or no later than prior to the next marine tank vessel loading operation, whichever is later.
 - 2) *Ship-to-shore compatibility of vapor collection systems.* Following the date on which the initial performance test is completed, marine tank vessel loading operations must be performed only if the marine tank vessel's vapor collection equipment is compatible to the terminal's vapor collection system; marine tank vessel loading operations must be performed only when the marine tank vessel's vapor collection equipment is connected to the terminal's

vapor collection system, as required in Condition V.Z.1.b above.

- 3) *Vapor-tightness requirements of the marine vessel.* The permittee shall use the procedures in paragraph V.Z.1.e.3)a), V.Z.1.e.3)b), V.Z.1.e.3)c) or V.Z.1.e.3)d) below to ensure that marine tank vessels are vapor tight, as required in Condition V.Z.1.c above. [§2103.12.h.6; §63.563(a)(4)]
 - a) *Pressure test documentation for determining vapor tightness of the marine vessel.* The owner or operator of a marine tank vessel shall provide a copy of the vapor-tightness pressure test documentation described in Condition V.Z.4.c below for each marine tank vessel prior to loading. The date of the test listed in the documentation must be within the preceding 12 months. The permittee must check vapor-tightness pressure test documentation for marine tank vessels loaded at positive pressure. [§2103.12.h.6; §63.563(a)(4)(i)]
 - b) *Leak test documentation for determining vapor tightness of the marine vessel.* If no documentation of the vapor tightness pressure test as described in paragraph V.Z.1.e.3)a) above is available, the owner or operator of a marine tank vessel shall provide the leak test documentation described in Condition V.Z.4.c below for each marine tank vessel prior to loading. The date of the test listed in the documentation must be within the preceding 12 months, and the test must be conducted in accordance with procedures in §63.565(c)(2). If the marine tank vessel has failed its most recent vapor-tightness leak test at that terminal, the owner or operator of the non-vapor-tight marine tank vessel shall provide documentation that the leaks detected during the previous vapor-tightness test have been repaired and documented with a successful vapor-tightness leak test described in §63.565(c)(2) conducted during loading. If the owner or operator of the marine tank vessel can document that repair is technically infeasible without cleaning and gas freeing or dry-docking the vessel, the owner or operator of the affected source may load the marine tank vessel. Following the date on which the initial performance test is completed, the permittee must check the vapor-tightness leak test documentation for marine tank vessels loaded at positive pressure. [§2103.12.h.6; §63.563(a)(4)(ii)]
 - c) *Leak test performed during loading using Method 21 for determining vapor tightness of the marine vessel.* If no documentation of vapor tightness as described in paragraphs V.Z.1.e.3)a) or V.Z.1.e.3)b) above is available, the owner or operator of a marine tank vessel shall perform a leak test of the marine tank vessel during marine tank vessel loading operation using the procedures described in §63.565(c)(2). [§2103.12.h.6; §63.563(a)(4)(iii)]
 - i) If no leak is detected, the owner or operator of a marine tank vessel shall complete the documentation described in Condition V.Z.4.c below prior to departure of the vessel.
 - ii) If a leak is detected, the owner or operator of the marine tank vessel shall document the vapor-tightness failure for the marine tank vessel prior to departure of the vessel. The leaking component shall be repaired prior to the next marine tank vessel loading operation at a controlled terminal unless the repair is technically infeasible without cleaning and gas freeing or dry-docking the vessel. If the owner or operator of the vessel provides documentation that repair of such equipment is technically infeasible without cleaning and gas freeing or dry-docking the vessel, the equipment responsible for the leak will be excluded from future Method 21 tests until repairs are effected. A copy of this documentation shall be maintained by the owner or operator of the affected source. Repair of the equipment responsible for the leak shall occur

the next time the vessel is cleaned and gas freed or dry-docked. For repairs that are technically feasible without dry-docking the vessel, the permittee shall not load the vessel again unless the marine tank vessel owner or operator can document that the equipment responsible for the leak has been repaired.

- d) *Negative pressure loading.* The permittee shall ensure that a marine tank vessel is loaded with the product tank below atmospheric pressure (i.e., at negative gauge pressure). The pressure shall be measured between the facility's vapor connection and its manual isolation valve, and the measured pressure must be below atmospheric pressure. Following the date on which the initial performance test is completed, marine tank vessel loading operations for non-vapor-tight vessels must be performed below atmospheric pressure (i.e., at negative gauge pressure) in the product tank. [§2103.12.h.6; §63.563(a)(4)(iv)]

- f. VOC emissions from the Light Oil Barge Loading facility (P044) shall not exceed 0.17 lbs/hour and 0.75 tons/year at any time: [§2102.04.b.6]

2. Testing Requirements:

The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

- a. The permittee shall perform the following procedures for detecting and repairing leaks in the vapor collection systems: [§2103.12.h.6; §63.563(c)]
 - 1) The permittee shall inspect and monitor all ductwork and piping and connections to vapor collection systems and control devices once each calendar year using Method 21.
 - 2) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method, all ductwork and piping and connections to vapor collection systems and control devices shall be inspected to the extent necessary to positively identify the potential leak and any potential leaks shall be monitored within 5 days by Method 21. Each detection of a leak shall be recorded, and the leak shall be tagged until repaired.
 - 3) When a leak is detected, a first effort to repair the vapor collection system and control device shall be made within 15 days or prior to the next marine tank vessel loading operation, whichever is later.
- b. The permittee complying with Condition V.Z.1.e.3)d) above that load vessels at less than atmospheric pressure (i.e., negative gauge pressure) shall measure and record the loading pressure. The permittee shall install, calibrate, maintain, and operate a recording pressure measurement device (magnehelic gauge or equivalent device) and an audible and visible alarm system that is activated when the pressure vacuum specified in Condition V.Z.1.e.3)d) above is not attained. The permittee shall place the alarm system so that it can be seen and heard where cargo transfer is controlled. The permittee shall verify the accuracy of the pressure device once each calendar year with a reference pressure monitor (traceable to National Institute of Standards and Technology (NIST) standards or an independent pressure measurement device dedicated for this purpose). [§2103.12.h.6; §63.564(d)]

4. Record Keeping Requirements:

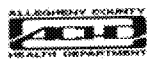
- a. The permittee shall maintain in an accessible location on site an engineering report describing in detail the vent system, or vapor collection system, used to vent each vent stream to a control device. This report shall include all valves and vent pipes that could vent the stream to the atmosphere, thereby bypassing the control device, and identify which valves are car-sealed opened and which valves are car-sealed closed. [§2103.12.h.6; §63.567(f)]
- b. The permittee shall keep the vapor-tightness documentation required under Condition V.Z.1.e.3) above on file at the source in a permanent form available for inspection. [§2103.12.h.6; §63.567(h)]
- c. The permittee shall maintain a documentation file for each marine tank vessel loaded at that source to reflect current test results as determined by the appropriate method in §63.565(c). Updates to this documentation file shall be made at least once per year. The permittee shall include, as a minimum, the following information in this documentation: [§2103.12.h.6; §63.567(i)]
 - 1) Test title;
 - 2) Marine vessel owner and address;
 - 3) Marine vessel identification number;
 - 4) Loading time, according to V.Z.1.e.3)b) or V.Z.1.e.3)c) above, if appropriate;
 - 5) Testing location;
 - 6) Date of test;
 - 7) Tester name and signature;
 - 8) Test results from §63.565(c) as appropriate;
 - 9) Documentation provided under V.Z.1.e.3)b) and V.Z.1.e.3)c)ii) above showing that the repair of leaking components attributed to a failure of a vapor-tightness test is technically infeasible without dry-docking the vessel; and
 - 10) Documentation that a marine tank vessel failing a pressure test or leak test has been repaired.
- d. When each leak of the vapor collection system is detected and repaired as specified in V.Z.3.a) above, the following information required shall be maintained for 5 years: [§2103.12.h.6; §63.567(k)]
 - 1) Date of inspection;
 - 2) Findings (location, nature, and severity of each leak);
 - 3) Leak determination method;
 - 4) Corrective action (date each leak repaired, reasons for repair interval); and
 - 5) Inspector name and signature.

5. Reporting Requirements:

- a. The permittee shall submit semiannual reports in accordance with General Condition III.15.d of the updated documentation file for each marine tank vessel that fails a pressure or leak test as required in Condition V.Z.4.c. The report shall contain the following information [§2103.12.k]:
 - 1) Test title;
 - 2) Marine vessel owner and address;
 - 3) Marine vessel identification number;
 - 4) Loading time, according to V.Z.1.e.3)b) or V.Z.1.e.3)c) above, if appropriate;

- 5) Testing location;
 - 6) Date of test;
 - 7) Tester name and signature;
 - 8) Test results from §63.565(c) as appropriate;
 - 9) Documentation provided under V.Z.1.e.3)b) and V.Z.1.e.3)c)ii) above showing that the repair of leaking components attributed to a failure of a vapor-tightness test is technically infeasible without dry-docking the vessel; and
 - 10) Documentation that a marine tank vessel failing a pressure test or leak test has been repaired.
- b. The permittee shall submit to the Administrator and Department, according to General Conditions III.4 and III.12 above, a notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the marine tank vessel loading operation has complied with the relevant standard in Conditions V.Z.1.a through V.Z.1.c above. The notification shall list: [§2103.12.h.6; §63.9(h)]
- 1) The methods that were used to determine compliance;
 - 2) The results of any performance tests, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - 3) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;
 - 4) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified;
 - 5) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and
 - 6) A statement by the permittee of the as to whether the Light Oil Barge Loading (P044) has complied with the relevant standard or other requirements I 40 CFR 63, Subpart Y.
- 6. Work Practice Standards:**
- a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the light oil loading facility, including associated air pollution control equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§2103.12.h.6; §63.562(e)]
 - b. The Department will determine compliance with design, equipment, work practice, or operational emission standards by evaluating the permittees conformance with operation and maintenance requirements. [§2103.12.h.6; §63.562(e)(1)]
 - c. The permittee shall develop and implement a written operation and maintenance plan that describes in detail a program of corrective action for varying (i.e., exceeding baseline parameters) air pollution control equipment and monitoring equipment, based on monitoring requirements in § 63.564, used to comply with these emissions standards. The plan shall also identify all routine or otherwise predictable continuous monitoring system (thermocouples, pressure transducers, continuous emissions monitors (CEMS), etc.) variances. [§2103.12.h.6; §63.562(e)(2)]

- 1) The plan shall specify procedures (preventive maintenance) to be followed to ensure that pollution control equipment and monitoring equipment functions properly and variances of the control equipment and monitoring equipment are minimal.
 - 2) The plan shall identify all operating parameters to be monitored and recorded for the air pollution control device as indicators of proper operation and shall establish the frequency at which the parameters will be monitored (see § 63.564).
 - 3) The permittee shall incorporate a standardized inspection schedule for each component of the control device used to comply with the emissions standards in § 63.562(b). To satisfy the requirements of this Condition, the permittee may use the inspection schedule recommended by the vendor of the control system or any other technical publication regarding the operation of the control system.
 - 4) The permittee shall develop and implement a continuous monitoring system (CMS) quality control program. The permittee shall develop and submit to the Department for approval upon request a site-specific performance evaluation test plan for the CMS performance evaluation required in §63.8(e) of subpart A of this part. Each quality control program shall include, at a minimum, a written protocol that describes procedures for initial and any subsequent calibration of the CMS; determination and adjustment of the calibration drift of the CMS; preventive maintenance of the CMS, including spare parts inventory; data recording, calculations, and reporting; and accuracy audit procedures, including sampling and analysis methods. The permittee shall maintain records of the procedures that are part of the quality control program developed and implemented for CMS.
- d. Based on the results of the determination made under Condition V.Z.6.c above, the Department may require the permittee to make changes to the operation and maintenance plan for that source. Revisions may be required if the plan: [§2103.12.h.6; §63.562(e)(3)]
- 1) Does not address a variance of the air pollution control equipment or monitoring equipment that has occurred that increases emissions;
 - 2) Fails to provide for operation during a variance of the air pollution control equipment or the monitoring equipment in a manner consistent with safety and good air pollution control practices; or
 - 3) Does not provide adequate procedures for correcting a variance of the air pollution control equipment or monitoring equipment as soon as reasonable.
- e. If the operation and maintenance plan fails to address or inadequately addresses a variance event at the time the plan was initially developed, the permittee shall revise the operation and maintenance plan within 45 working days after such an event occurs. The revised plan shall include procedures for operating and maintaining the air pollution control equipment or monitoring equipment during similar variance events and a program for corrective action for such events. [§2103.12.h.6; §63.562(e)(4)]
- f. The operation and maintenance plan shall be developed by the source's compliance date. The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Department for the life of the source. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection upon request by the Department for a period of 5 years after each revision to the plan. [§2103.12.h.6; §63.562(e)(5)]

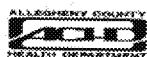


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- g. To satisfy the requirements of the operation and maintenance plan, the permittee may use the source's standard operating procedures (SOP) manual, an Occupational Safety and Health Administration (OSHA) plan, or other existing plans provided the alternative plans meet the requirements of this section and are made available for inspection when requested by the Department. [§2103.12.h.6; §63.562(e)(6)]

PERMIT SHIELD IN EFFECT



**EMISSION UNIT TERMS
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**U. S. Steel Clairton Works
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AA. Boiler No. 1: B001

Process Description: Steam production
Facility ID: B001
Max. Design Rate: 760 MMBtu/hr (Heat Input)
Capacity: 760 MMBtu/hr (Heat Input)
Raw Materials: Desulfurized coke oven gas and natural gas
Control Device: NA

I. Restrictions:

- a. Only coke oven gas and natural gas shall be combusted in Boiler B001. [§2103.12.a.2]
- b. The permittee shall not flare, mix or combust coke oven gas, or allow such gas to be flared, mixed, or combusted in Boiler No. 1, unless the concentration of sulfur compounds, measured as hydrogen sulfide, in such gas is less than or equal to 40 grains per hundred dry standard cubic feet of coke oven gas. [§2105.21.h.4]
- c. Emissions of NO_x shall not, at any time, exceed 0.54 lb/MMBtu. [§2105.06.b.5; RACT Plan 234]
- d. Boiler No. 1 (B001) shall have properly maintained and operated Continuous Monitoring Systems or approved alternatives for continuously monitoring the NO_x concentration in the exhaust gas, meeting all the requirements of §2108.03 at all times with the exception of emergency or planned outages, repairs or maintenance. [§2105.06; RACT Plan 234]
- e. Boiler B001 shall be properly maintained and operated according to good engineering and air pollution control practices at all times. [§2105.03; RACT Plan 234]
- f. Except for fuel emergencies of limited duration with prior Department approval, the permittee shall not operate, or allow to be operated, Boiler No. 1 in such manner that emissions of particulate matter exceed 0.02 pounds per million BTUs of actual heat input at any time, regardless of the type of fuel used [§2104.02.a.4; §2104.02.a.5]
- g. The permittee shall not operate, or allow to be operated, Boiler No. 1 (B001) in such manner that the opacity of visible emissions, excluding uncombined water: [§2104.01.a]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- h. Condition V.AA.1.g above shall not apply to visible emissions resulting solely from the cold start of Boiler B001 if such cold start has been reported as required by §2108.01.d. [§2104.b.3]
- i. The NO_x emission limitations in Condition V.AA.1.c above, shall be determined by a thirty (30) day rolling average and by a twelve (12) month rolling average of CEM data for the lbs/MMBtu and tons/yr emission limitation respectively. [RACT Plan 234]

- j. **Emissions Limitations:** Emissions from Boiler B001 shall not exceed the limits listed in Table V-AA-1 at any time: [§2105.06.b.5; §2105.03]

TABLE V-AA-1: Boiler 1 Emission Limitations

POLLUTANT	HOURLY EMISSION LIMIT (lb/hr)	ANNUAL EMISSION LIMIT (tons/year) ¹
Particulate Matter	15.20	66.58
PM-10	15.20	66.58
NO _x	410.40	1,740
SO ₂	163.50 ²	716.11 ²

¹A year is defined as any consecutive 12-month period.

² County-only enforceable. (§2103.22.d.)

2. Testing Requirements:

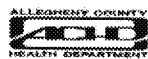
- a. The permittee shall perform Relative Accuracy Test Audits (RATA) of the NO_x CEMS as specified in 25 PA Code §§139.101 - 139.111. [§2108.03]
- b. The permittee shall perform emissions tests and evaluations for CO and VOC on Boiler 1 to develop emission factors that can be applied to quantify CO & VOC emissions. Testing for CO and VOC shall be conducted in accordance with approved EPA Methods in Appendix A of 40 CFR Part 60, Article XXI §2108.02, and as approved by the Department. Reports of the stack testing results shall be submitted to the Department within 90 days of the date of the stack test. The evaluation report shall be made available to the Department upon request and upon permit renewal. (§2103.12.h.1; §2108.02.b, §2108.02.e.)
- c. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

- a. The permittee shall install, operate, and maintain continuous nitrogen oxides monitoring systems and other monitoring systems to convert data to required reporting units in compliance with 25 PA Code §§139.101 - 139.111 relating to requirements for continuous in-stack monitoring for stationary sources. [§2108.03.b.2 and RACT Plan 234]
- b. The volume of coke oven gas and natural gas combusted in Boiler No. 1 and the H₂S content of the coke oven gas shall be monitored and recorded on a daily basis (midnight to midnight). [§2103.12.i]

4. Record Keeping Requirements:

- a. The permittee shall record all exceedances of the emission limitations for NO_x as specified in Conditions V.AA.1.c and V.AA.1.i above. [RACT Plan 234]



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- b. The permittee shall maintain records of the daily amounts of coke oven gas and natural gas combusted and the H₂S content of the coke oven gas. [§2103.12.j]

5. Reporting Requirements:

- a. The permittee shall submit a semiannual report to the Department in accordance with the requirements of General Condition III.15 above that lists each exceedance of the 30-day rolling average emission limitation for NO_x of 0.54 lb/MMBtu and the 12-month rolling average emission limitation for NO_x of 1,740 tons/yr. The date of each exceedance shall also be listed. [§2103.12.k]
- b. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15 above of the monthly usage of coke oven gas and natural gas and the monthly average H₂S content of the coke oven gas. [§2103.12.k]

6. Additional Requirements

40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters is hereby incorporated by reference. The Department shall reopen the permit to incorporate specific requirements from 40 CFR 63, Subpart DDDDD in accordance with §2103.25.a.1.. [§2103.12.h.6; §2103.12.f.3; §2103.25.a.1]

PERMIT SHIELD IN EFFECT

BB. Boiler No. 2: B002

Process Description: Steam production
Facility ID: B002
Max. Design Rate: 481 MMBtu/hr (Heat Input)
Capacity: 481 MMBtu/hr (Heat Input)
Raw Materials: Desulfurized coke oven gas and natural gas
Control Device: NA

1. Restrictions:

- a. Only coke oven gas and natural gas shall be combusted in Boiler No. 2 (B002). [§2103.12.a.2]
- b. The permittee shall not flare, mix or combust coke oven gas, or allow such gas to be flared, mixed, or combusted in Boiler No. 2, unless the concentration of sulfur compounds, measured as hydrogen sulfide, in such gas is less than or equal to 40 grains per hundred dry standard cubic feet of coke oven gas. [§2105.21.h.4]
- c. Emissions of NO_x shall not, at any time, exceed 0.54 lb/MMBtu. [RACT Plan 234; §2105.06.b; and §2103.12.a.2.B]
- d. Boiler No. 2 (B002) shall have properly maintained and operated Continuous Monitoring Systems or approved alternatives for continuously monitoring the NO_x concentration in the exhaust gas, meeting all the requirements of §2108.03 at all times with the exception of emergency or planned outages, repairs or maintenance. [RACT Plan 234; 25 PA Code §123.51]
- e. Boiler B002 shall be properly maintained and operated according to good engineering and air pollution control practices at all times. [RACT Plan 234; §2105.03]
- f. The permittee shall not operate, or allow to be operated, Boiler No. 2 in such manner that emissions of particulate matter exceed the rate established by the formula in §2104.02.a.3[§2104.02.a.3 and §2104.02.a.1.C]
- g. As an alternative to Condition V.BB.1.f, except for fuel emergencies of limited duration with prior Department approval, the permittee shall not operate, or allow to be operated, Boilers No. 1 and No. 2 in such manner that emissions of particulate matter exceed 0.02 pounds per million BTUs of actual heat input at any time, regardless of the fuel used. [§2104.02.a.5]
- h. The permittee shall not operate, or allow to be operated, Boiler No. 2 (B002) in such manner that the opacity of visible emissions, excluding uncombined water: [§2104.01.a and §2108.01.d]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- i. Condition V.BB.1.h above shall not apply to visible emissions resulting solely from the cold start of Boiler B001 if such cold start has been reported as required by §2108.01.d. [§2104.b.3]
- j. The NO_x emission limitations in Condition V.BB.1.c above, shall be determined by a thirty (30) day rolling average and by an twelve (12) month rolling average of CEM data for the lbs/MMBtu and tons/yr emission limitation respectively. [RACT Plan 234]

- k. **Emissions Limitations:** Emissions from Boiler No. 2 (B002) shall not exceed the limits listed in Table V-FF-1 at any time: [§2105.06.b.5; §2105.03]

**TABLE V-BB-1
B002 Emission Limitations**

POLLUTANT	HOURLY EMISSION LIMIT (lb/hr)	ANNUAL EMISSION LIMIT (tons/year)*
Particulate Matter	9.62	42.14
PM-10	9.62	42.14
NO _x	259.74	1285.0
SO ₂	103.48 ²	453.22 ²

¹A year is defined as any consecutive 12-month period.

²County-only enforceable. (§2103.22.d.)

2. Testing Requirements:

- a. The permittee shall perform Relative Accuracy Test Audits (RATA) of the NO_x CEMS as specified in 25 PA Code §§139.101 - 139.111. [§2108.03]
- b. The permittee shall perform emissions tests and evaluations for CO and VOC on Boiler 2 to develop emission factors that can be applied to quantify CO & VOC emissions. Testing for CO and VOC shall be conducted in accordance with approved EPA Methods in Appendix A of 40 CFR Part 60, Article XXI §2108.02, and as approved by the Department. Reports of the stack testing results shall be submitted to the Department within 90 days of the date of the stack test. The evaluation report shall be made available to the Department upon request and upon permit renewal. (§2103.12.h.1; §2108.02.b, §2108.02.e.)
- c. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

- a. The permittee shall install, operate, and maintain continuous nitrogen oxides monitoring systems and other monitoring systems to convert data to required reporting units in compliance with 25 PA Code §§139.101 - 139.111 relating to requirements for continuous in-stack monitoring for stationary sources. [§2108.03.b.2]
- b. The volume of coke oven gas and natural gas combusted in Boiler No. 2 and the H₂S content of the coke oven gas shall be monitored and recorded on a daily basis (midnight to midnight). [§2103.12.i]

4. Record Keeping Requirements:

- a. The permittee shall record all exceedances of the emission limitations for NO_x as specified in Conditions V.BB.1.c and V.BB.1.j above. [RACT Plan 234]

- b. The permittee shall maintain records of the daily amounts of coke oven gas and natural gas combusted and the H₂S content of the coke oven gas. [§2103.12.j]

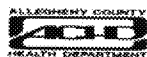
5. **Reporting Requirements:**

- a. The permittee shall submit a semiannual report to the Department in accordance with the requirements of General Condition III.15 above that lists each exceedance of the 30-day rolling average emission limitation for NO_x of 0.54 lb/MMBtu and the 12-month rolling average emission limitation for NO_x of 1,285 tons/yr. The date of each exceedance shall also be listed. [§2103.12.k]
- b. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15 above of the monthly usage of coke oven gas and natural gas and the monthly average H₂S content of the coke oven gas. [§2103.12.k]

6. **Additional Requirements:**

40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters is hereby incorporated by reference. The Department shall reopen the permit to incorporate specific requirement from 40 CFR 63, Subpart DDDDD in accordance with §2013.25.a.1 [§2103.12.h.6; §2103.12 §2103.25.a.1]

PERMIT SHIELD IN EFFECT



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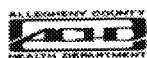
**U. S. Steel Clairton Works
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CC. Boilers R1 and R2: B005 & B006

Process Description: Steam production
Facility ID: B005 & B006
Max. Design Rate: 229 MMBtu/hr, each (Heat Input)
Capacity: 229 MMBtu/hr, each (Heat Input)
Raw Materials: Desulfurized coke oven gas and natural gas
Control Device: NA

I. Restrictions:

- a. Only coke oven gas and natural gas shall be combusted in Boilers R1 and R2. [§2103.12.a.2]
- b. The permittee shall not flare, mix or combust coke oven gas, or allow such gas to be flared, mixed, or combusted in Boilers R1 and R2, unless the concentration of sulfur compounds, measured as hydrogen sulfide, in such gas is less than or equal to 40 grains per hundred dry standard cubic feet of coke oven gas. [§2105.21.h.4]
- c. Emissions of NO_x from each Boiler R1 or Boiler R2 shall not, at any time, exceed 0.54 lb/MMBtu. [RACT Plan 234; §2105.06.b.5]
- d. Boilers R1 and R2 shall be properly maintained and operated according to good engineering and air pollution control practices at all times. [RACT Plan 234]
- e. Except for fuel emergencies of limited duration with prior Department approval, the permittee shall not operate, or allow to be operated, Boilers R1 or R2 in such manner that emissions of particulate matter exceed 0.02 pounds per million BTUs of actual heat input at any time, regardless of the type of fuel used. [§2104.02.a.4.D]
- f. The permittee shall not operate, or allow to be operated, Boiler R1 or Boiler R2 in such manner that the opacity of visible emissions, excluding uncombined water: [§2104.01.a and §2108.01.d]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- g. Condition V.CC.1.f above shall not apply to visible emissions resulting solely from the cold start of Boiler R1 or Boiler R2, if such cold start has been reported as required by §2108.01.d. [§2104.b.3]

**EMISSION UNIT TERMS
AND CONDITIONS****U. S. Steel Clairton Works
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- h. **Emissions Limitations:** Emissions from each boiler (Boiler R1 and Boiler R2) shall not exceed the limits listed in Table V-CC-1 at any time: [§2105.06.b; §2105.03]

TABLE V-CC-1
Emission Limitations for Boiler R1 or Boiler R2 (B005 or B006)

POLLUTANT	HOURLY EMISSION LIMIT Per Boiler (lb/hr)	ANNUAL EMISSION LIMIT Per Boiler (tons/year)^{1*}
Particulate Matter	4.58	20.06
PM-10	4.58	20.06
NO _x	123.66	525.0
SO ₂	49.26 ²	215.78 ²

¹A year is defined as any consecutive 12-month period.

²County-only enforceable. (§2103.22.d.)

2. Testing Requirements:

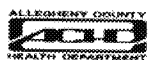
- a. The permittee shall perform emissions testing on Boilers R1 and R2 at least once every two years for NO_x. Such testing shall be in accordance with the §2107.05, or other such methods as approved by the Department. [RACT Plan 234 and §2108.02.c]
- b. The permittee shall perform emissions tests and evaluations for CO and VOC on Boilers R1 and R2 to develop emission factors that can be applied to quantify CO & VOC emissions. Testing for CO and VOC shall be conducted in accordance with approved EPA Methods in Appendix A of 40 CFR Part 60, Article XXI §2108.02, and as approved by the Department. Reports of the stack testing results shall be submitted to the Department within 90 days of the date of the stack test. The evaluation reports shall be made available to the Department upon request and at permit renewal. (§2103.12.h.1; §2108.02.b, §2108.02.e.)
- c. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

- a. The volume of coke oven gas and natural gas combusted in Boilers R1 and R2 and the H₂S content of the coke oven gas shall be monitored and recorded on a daily basis (midnight to midnight). [§2103.12.i]

4. Record Keeping Requirements:

- a. The permittee shall record and maintain records of the type and amount of each fuel combusted during each day in Boilers R1 and R2 and the H₂S content of the coke oven gas. [RACT Plan 234 and §2103.12.j.1]



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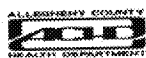
5. Reporting Requirements:

- a. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15 above of the monthly usage of coke oven gas and natural gas in Boilers R1 and R2 and the monthly average H₂S content of the coke oven gas. [§2103.12.k]

6. Additional Requirements

- a. 40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters is hereby incorporated by reference. The Department shall reopen the permit to incorporate specific requirements from 40 CFR 63, Subpart DDDDD in accordance with §2103.25.a.1. [§2103.12.h.6; §2103.12.f.3; §2103.25.a.1]

PERMIT SHIELD IN EFFECT



EMISSION UNIT TERMS AND CONDITIONS

U. S. Steel Clairton Works
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DD. Boilers T1 and T2: B007 & B008

Process Description: Steam production
Facility ID: B007
Max. Design Rate: 156 MMBtu/hr, each (Heat Input)
Capacity: 156 MMBtu/hr, each (Heat Input)
Raw Materials: Desulfurized coke oven gas and natural gas
Control Device: NA

1. Restrictions:

- a. Only coke oven gas and natural gas shall be combusted in Boilers T1 and T2. [§2103.12.a.2]
- b. The permittee shall not flare, mix or combust coke oven gas, or allow such gas to be flared, mixed, or combusted in Boilers T1 and T2, unless the concentration of sulfur compounds, measured as hydrogen sulfide, in such gas is less than or equal to 40 grains per hundred dry standard cubic feet of coke oven gas. [§2105.21.h.4]
- c. Emissions of NO_x from each Boiler T1 or Boiler T2 shall not, at any time, exceed 0.54 lb/MMBtu. [RACT Plan 234; §2105.06.b.5; and §2103.12.a.2.B]
- d. Boilers T1 and T2 shall be properly maintained and operated according to good engineering and air pollution control practices at all times. [RACT Plan 234]
- e. Except for fuel emergencies of limited duration with prior Department approval, the permittee shall not operate, or allow to be operated, Boilers T1 or T2 in such manner that emissions of particulate matter exceed 0.02 pounds per million BTUs of actual heat input at any time, regardless of the type of fuel used. [§2104.02.a.4.F & G]
- f. When combusting COG and natural gas simultaneously in Boilers T1 and T2, particulate mass emissions shall not exceed the rate determined by the formula in §2104.02.a.3. The allowable emissions for COG and natural gas to be used in the formula are specified in Condition V.DD.1.e above. As an alternative to Condition V.DD.1.e, except for fuel emergencies of limited duration with prior Department approval, the permittee shall not operate, or allow to be operated, Boilers T1 or T2 in such manner that emissions of PM-10 exceed 0.12 pounds per million BTUs of actual heat input at any time, regardless of the fuel used. [§2104.02.a.5]
- g. The permittee shall not operate, or allow to be operated, Boiler T1 or Boiler T2 in such manner that the opacity of visible emissions, excluding uncombined water: [§2104.01.a and §2108.01.d]
 - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or,
 - 2) Equal or exceed an opacity of 60% at any time.
- h. Condition V.DD.1.g above shall not apply to visible emissions resulting solely from the cold start of Boiler T1 and Boiler T2, if such cold start has been reported as required by §2108.01.d. [§2104.b.3]

- i. Emissions from Boiler T1 or Boiler T2 (B007 or B008) shall not exceed the limits listed in Table V-DD-1 at any time: [§2105.03]

TABLE V-DD-1 - Emission Limitation for Boilers T1 or T2

POLLUTANT	HOURLY EMISSION LIMIT Per Boiler (lb/hr)	ANNUAL EMISSION LIMIT Per Boiler (tons/year)*
Particulate Matter	3.12	13.67
PM-10	3.12	13.67
NO _x	84.24	358
SO ₂	33.56	146.99

*A year is defined as any consecutive 12-month period.

2. Testing Requirements:

- The permittee shall perform emissions testing on Boilers T1 and T2 at least once every two years for NO_x. Such testing shall be in accordance with the §2107.05, or other such methods as approved by the Department. [RACT Plan 234 and §2108.02.c]
- The permittee shall perform emissions tests and evaluations for CO and VOC on Boilers T1 and T2 to develop emission factors that can be applied to quantify CO & VOC emissions. Testing for CO and VOC shall be conducted in accordance with approved EPA Methods in Appendix A of 40 CFR Part 60, Article XXI §2108.02, and as approved by the Department. Reports of the stack testing results shall be submitted to the Department within 90 days of the date of the stack test. The evaluation report shall be made available to the Department upon request and at permit renewal. (§2103.12.h.1; §2108.02.b, §2108.02.e.)
- The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above and Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

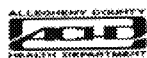
The volume of coke oven gas and natural gas combusted in Boilers T1 and T2 and the H₂S content of the coke oven gas shall be monitored and recorded on a daily basis (midnight to midnight). [§2103.12.i]

4. Record Keeping Requirements:

The permittee shall record and maintain records of the type and amount of each fuel combusted during each day in Boilers T1 and T2 and the H₂S content of the coke oven gas. [RACT Plan 234 and §2103.12.j.1]

5. Reporting Requirements:

The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15 above of the monthly usage of coke oven gas and natural gas in Boilers T1 and T2 and the monthly average H₂S content of the coke oven gas. [§2103.12.k]



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6. Workpractice Requirements:

None except as provided elsewhere.

7. Additional Requirements:

40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters is hereby incorporated by reference. The Department shall reopen the permit to incorporate specific requirements from 40 CFR 63, Subpart DDDDD in accordance with §2103.25.a.1. [§2103.12.h.6; §2103.12.f.3; §2103.25.a.1]

PERMIT SHIELD IN EFFECT

EE. Ammonia Flare: B010

Process Description: Three 5 million gallon wastewater treatment surge tanks and anhydrous ammonia loading station with enclosed flare to control emissions.
Raw Materials: Wastewater surge tank emissions and ammonia emissions
Control Device(s): 12.5 MMBtu/hr enclosed flare (Process Combustion Corporation NPO-0995-27/K)
Facility ID: B010
Max. Design Rate: 12.5 MMBtu/hour
Capacity: n/a

1. Restrictions:

- a. The permittee shall not operate or allow to be operated the wastewater tanks and/or anhydrous ammonia loading station unless the emissions are exhausted through an enclosed flare and the flare is properly maintained and operated so that a minimum destruction efficiency of 98% is maintained. [Installation Permit 0052-1002b, January 20, 2005 and §2102.04.b.6]
- b. Flare operating hours shall not exceed 2,920 hours per year for the wastewater surge tanks and 1,400 hours per year for the ammonia loading station. [Installation Permit 0052-1002b, January 20, 2005 and §2102.04.b.6]
- c. The permittee shall operate and maintain the enclosed flare at a temperature of 1,570 degrees Fahrenheit or higher with a minimum residence time of 0.50 seconds at all times when emissions from the wastewater surge tanks and/or anhydrous ammonia loading operations are exhausted to the flare. [Installation Permit 0052-1002b, January 20, 2005 and §2102.04.b.6]
- d. **Emissions Limitations:** Emissions from Ammonia Flare (B010) shall not exceed the limits listed in Table V-EE-1 at any time: [Installation Permit 0052-1002b, January 20, 2005 and §2102.04.b.6]:

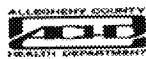
**Table V-EE-1
 Ammonia Flare Emission Limitations**

Pollutant	Total Emissions	
	lb/hr	tons/yr ¹
SO ₂	1.0	1.5
NO _x	19.80	19.03
CO	0.44	0.95
VOC	0.30	0.49
Ammonia	20.0	14.0

¹ A year is defined as any consecutive 12-month period

2. Testing Requirements:

- a. Emissions testing shall be performed once every 5 years in accordance with the Site Level Condition IV.13 above entitled "Emissions Testing Requirements" to determine the VOC



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destruction efficiency of the enclosed flare and the mass emission rate of nitrogen oxides, sulfur oxides and ammonia. [Installation Permit 0052-I002b, January 20, 2005, §2102.04.e and §2108.02]

3. Monitoring Requirements:

- a. The permittee shall monitor and record the operating hours for each operation of the wastewater surge tanks and each loading at the ammonia station. [Installation Permit 0052-I002b, January 20, 2005 and §2103.12.i]
- b. The permittee shall continuously monitor and record the temperature of the flare with tolerance +/- 10 degrees Fahrenheit when the equipment is in operation. [Installation Permit 0052-I002b, January 20, 2005 and §2103.12.i]

4. Record Keeping Requirements:

- a. The results of inspections, episodes of non-compliance with the conditions in Conditions V.EE.1.a through V.EE.1.d above, and corrective actions taken shall be recorded upon occurrence. [Installation Permit 0052-I002b, January 20, 2005 and §2103.12.j]
- b. The permittee shall record the monthly propane usage for the flare and the daily hours of operation of the flare. [Installation Permit 0052-I002b, January 20, 2005 and §2103.12.j]

5. Reporting Requirements:

- a. Monthly fuel usage and monthly hours of operation shall be reported to the Department on an annual basis. (Installation Permit 0052-I002b, January 20, 2005 and §2102.04.b.6)
- b. Reporting instances of non-compliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above, if appropriate. (Installation Permit 0052-I002b, January 20, 2005 and §2102.04.b.4)

PERMIT SHIELD IN EFFECT



**EMISSION UNIT TERMS
AND CONDITIONS**

**U. S. Steel Clairton Works
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FF. Abrasive Blasting: G001

Process Description: Abrasive blasting of coke oven doors to remove carbon and rust and the removal of rust from other equipment.
Facility ID: G001
Capacity: NA
Raw Materials: Abrasive blasting material (Black Beauty or similar abrasive)
Control Device: Central oven door repair area is enclosed.

1. Restrictions:

- a. The permittee shall not conduct, or allow to be conducted, abrasive blasting of any surface, structure, or part thereof, which has a total area of 10,000 square feet unless: [§2105.51]
 - 1) Such abrasive blasting complies with all applicable requirements in §2105.51; and
 - 2) The permittee of such surface:
 - a. Which has a total area greater than 10,000 square feet, has properly applied for and been issued, by the Department, either an abrasive blasting project permit or annual permit.
 - b. Which Has a total area greater than 1,000 square feet but not more than 10,000 squares feet, has properly submitted a notice to the Department
- b. The permittee shall not operate, or allow to be operated, the abrasive blasting of coke oven doors in such manner that emissions from the abrasive blasting operation: [§2104.01]
 - 1) Have an opacity of 20% or more for a period or periods aggregating more than three (3) minutes in any 60 minute period; or
 - 2) Have an opacity of 60% or more at any time.

2. Testing Requirements:

None except as provided elsewhere.

3. Monitoring Requirements:

None except as provided elsewhere.

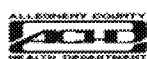
4. Record Keeping Requirements:

The permittee shall record and maintain records, on a monthly basis, of the square feet of surface area cleaned by abrasive blasting. (§2103.12,j)

5. Reporting Requirements:

None except as provided elsewhere

PERMIT SHIELD IN EFFECT



**EMISSION UNIT TERMS
AND CONDITIONS**

**U. S. Steel Clairton Works
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GG. Cold Cleaning Machines:

Process Description: Equipment Cleaning
Facility ID: P001
Capacity: NA
Raw Materials:
Control Device: NA

1. Restrictions:

The permittee shall not operate, or allow to be operated, any cold cleaning degreaser with a degreaser opening exceeding ten (10) square feet, unless [§2105.15a]:

A. There is in operation such degreaser:

- a. A cover to prevent evaporation of solvent during periods of non-use;
- b. Equipment for draining cleaned parts; and
- c. A permanent conspicuous label summarizing the operating requirements set forth in V.GG.1.B below

B. Such degreaser is operated at all times in such manner that:

- a. Waste solvents are transferred to another party or disposed of by means insuring that no more than 20% by weight of the solvents evaporate into the open air;
- b. Waste solvents are stored in covered containers;
- c. The degreaser cover is closed when parts are not being processed through the degreaser; and,
- d. Cleaned parts are drained for at least 15 seconds or until dripping ceases

2. Testing Requirements:

None except as provided elsewhere.

3. Monitoring Requirements (§2102.04.e):

None except as provided elsewhere.

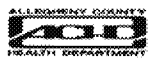
4. Record Keeping Requirements:

The permittee shall keep records of solvent usage (type and amount) on a semiannual basis.

5. Reporting Requirements:

None except as provided elsewhere.

PERMIT SHIELD IN EFFECT



VI. ALTERNATIVE OPERATING SCENARIOS

There are no alternative operating scenarios for this facility.

VII. EMISSIONS LIMITATIONS SUMMARY

[This section is provided for informational purposes only and is not intended to be an applicable requirement.]

The following table summarizes the estimated annual maximum potential emissions (which may not include fugitive) from the U. S. Steel Mon Valley Works - Clairton Plant. These annual (consecutive 12 month) emission estimates assume that all sources operate continuously at their maximum capacity.

TABLE VII-1 – Permit Emission Limitations Summary

POLLUTANT	ANNUAL EMISSION LIMIT (tons/year)*
Particulate Matter	990.33
PM-10	708.85
Sulfur Dioxide	3,694.32
Carbon Monoxide	0.95
Nitrogen Oxides	4,810.03
Volatile Organic Compounds	68.49
Ammonia	14.0
Benzene	54.0

* A year is defined as any consecutive 12-month period.

VIII. MISCELLANEOUS

The following activities are considered trivial:

- Demolition activities.
- Sandblast grit storage boxes.
- Coal yard sedimentation ponds cleaning out and maintenance activities.
- Baghouse dust handling and transportation.
- Using commercial chemical products not produced at the Clairton Works.
- Battery pitch traps.
- Flushing liquor return line vents.
- Waste water treatment plant and associated activities.
- Methanol/antifreeze addition to air lines, coal belts and coke.
- Degreasers (non-halogenated solvent) with a cross-sectional area less than 10 square feet.
- Gasoline and diesel fuel vehicle-fueling operations.
- Coal storage yard sedimentation pond clean out.
- Space heaters
- Air conditioners

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